

PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Multi-Color Corporation
2281 South U.S. 31
Scottsburg, Indiana 47170**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T143-9310-00007	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality Original signed by Janet McCabe	Issuance Date: April 16, 2001 Expiration Date: April 16, 2006

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary packaging rotogravure printing source.

Responsible Official:	John P. McKeough, Vice President of Operations
Source Address:	2281 South U.S. 31, Scottsburg, Indiana 47170
Mailing Address:	2281 South U.S. 31, Scottsburg, Indiana 47170
SIC Code:	2754
County Location:	Scott
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (1) one (1) ten (10) station packaging rotogravure printing press identified as Press #1 (ten stations: P1U1 through P1U10), constructed in May of 1990, with a maximum line speed of 840 feet per minute (ft/min) when printing with ink and 740 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system with a total heat input rate of 7.76 million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) emissions from P1U1-P1U10 are controlled by one of the following:
 - (a) a single catalytic oxidizing incinerator identified as OXD#1 exhausting through one (1) stack (S/V ID: S-OXD1); or
 - (b) a single catalytic oxidizing incinerator identified as OXD#2 exhausting through one (1) stack (S/V ID: S-OXD2); or
 - (c) two (2) catalytic oxidizing incinerators configured in parallel, respectively identified as OXD#1 and OXD#2, with each incinerator exhausting through one (1) stack (S/V ID: S-OXD1 and S-OXD2), respectively.
- (2) one (1) nine (9) station packaging rotogravure printing press identified as Press #2 (nine stations: P2U1 through P2U9), constructed in April of 1991, with a maximum line speed of 840 feet per minute (ft/min) when printing with ink and 740 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system with a total heat input rate of 7.76 million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) emissions from P2U1-P2U9 are controlled by one of the following:
 - (a) a single catalytic oxidizing incinerator identified as OXD#2 exhausting through one (1) stack (S/V ID: S-OXD2); or
 - (b) a single catalytic oxidizing incinerator identified as OXD #5 exhausting through one

- (1) stack (S/V ID: S-OXD5); or
 - (c) two (2) catalytic oxidizing incinerators configured in parallel, respectively identified as OXD#2 and OXD#5, with each incinerator exhausting through one (1) stack (S/V ID: S-OXD2 and S-OXD5), respectively.
- (3) one (1) eight (8) station packaging rotogravure printing press identified as Press #3 (eight stations: P3U1 through P3U8), constructed in April of 1997, with a maximum line speed of 800 ft/min when printing with ink and 700 ft/min when printing with ink and adhesive. The volatile organic compound (VOC) emissions from P3U1-P3U8 are controlled by one catalytic oxidizing incinerator identified as OXD#5 exhausting through one (1) stack (S/V ID: S-OXD5).
- (4) one (1) eight (8) station packaging rotogravure printing press identified as Press #4 (eight stations: P4U1 through P4U8), constructed in January of 1997, with a maximum line speed of 800 feet per minute (ft/min) when printing with ink and 700 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system with a total heat input rate of twelve (12) million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) emissions from P4U1-P4U8 are controlled by one of the following:
 - (a) a single catalytic oxidizing incinerator identified as OXD#3 exhausting through one (1) stack (S/V ID: S-OXD3); or
 - (b) a single thermal oxidizing incinerator identified as OXD#4 exhausting through one (1) stack (S/V ID: S-OXD4); or
 - (c) catalytic and thermal oxidizing incinerators configured in parallel, respectively identified as OXD#3 and OXD#4, with each incinerator exhausting through one (1) stack (S/V ID: S-OXD3 and S-OXD4), respectively.
- (5) one (1) mechanical spray cold cleaner degreaser, identified as PW1, constructed in June of 1990, with a solvent consumption rate of thirty-three (33) gallons per day, utilizing closed-loop solvent recycling and distillation for VOC emissions control, and exhausting through one (1) stack (S/V ID: S-MR1);
- (6) one (1) mechanical spray cold cleaner degreaser, identified as PW2, with a projected solvent consumption rate of four (4) gallons per day, utilizing closed-loop solvent recycling and distillation for VOC emissions control, and exhausting through one (1) stack (S/V ID: S-MR1); and
- (7) one (1) immersion and mechanical spray cold cleaner degreaser, identified as SD1, constructed in September of 1993, with a solvent consumption rate of fourteen (14) gallons per day, equipped with cover for VOC emissions control, and exhausting through one (1) stack (S/V ID: S-MR1);

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
 - (a) one (1) natural gas fired hot oil boiler identified as TH1 used to heat Press #3, rated at 6 MMBtu per hour and exhausting through one (1) stack identified as

S004.

- (2) VOC and/or HAP storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000.
- (3) Degreasing operations that do not exceed 145 gallons per twelve (12) months, except if subject to 326 IAC 20-6.
- (4) Other categories with emissions below insignificant thresholds:
 - (a) one (1) corona treater unit which generates ozone at a rate of 0.074 pounds ozone/kilowatt/hour (supplier factor). Ozone generation rates for Press #2 treater: 16 kW = 5.18 tons per year ozone maximum.
 - (b) one (1) 10,000 gallon, three-compartment horizontal solvent storage tank, storing isopropyl acetate or lower vapor pressure products, with VOC emissions below 15 pounds per day;
 - (c) one (1) 8,000 gallon vertical solvent storage tank, storing isopropyl acetate or lower vapor pressure products, with VOC emissions below 15 pounds per day;
 - (d) Ink mixing activities including an automated ink dispensing system with VOC emissions below 15 pounds per day;
 - (e) One (1) Offset Gravure Coater station with an Electron Beam Curing Unit, with a maximum line speed of 1000 feet per minute and a printing width of 42 inches with maximum coverage of 4.74 pounds per million square inches; and
 - (f) two (2) cyclone separators for collecting paper and plastic trim generated from label trimming operations, which is then fed to a bailer which bales the material in preparation for off-site recycling or disposal. Potential PM-10 emissions from this operation are less than 25 pounds per day.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:.

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.3 Enforceability [326 IAC 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit, or for information claimed to be confidential, the Permittee may furnish such records directly to the U.S. EPA along

with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]

- (c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act and is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in condition B, Emergency Provisions.

B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMP's shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.12 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,
Compliance Section), or

Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile, to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(10) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
- (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the

Permittee may not continue to operate the affected emissions facilities unless:

- (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
- (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. All previously issued operating permits are superseded by this permit.
- (c) In addition to the nonapplicability determinations set forth in Sections D of this permit, the IDEM, OAQ has made the following determinations regarding this source:
 - (1) All VOC emission limits from the previous permits are going to be revised to limit the potential to emit VOC to less than 250 tons per year to avoid 326 IAC 2-2 (PSD) and 40 CFR 52.21. The applicant has also requested the option of applying water based materials which do not require the use of VOC control equipment to comply with 326 IAC 8-5-5 (Printing Operations). Therefore, operating conditions from previously issued construction permits which require total permanent enclosure of the thermal and catalytic oxidizing incinerators, and operation of the incinerators at all times, are going to be modified in this Part 70 Permit.
- (d) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable

requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

- (e) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (f) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (g) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (h) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (i) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(7)]

B.14 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent.

Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.

The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
 - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may

provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
- (1) A timely renewal application is one that is:
- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAQ fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
 - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality

100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a).

For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by 326 IAC 2 and 326 IAC 2-7-10.5.

B.22 Inspection and Entry [326 IAC 2-7-6(2)] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy any records that must be kept under the conditions of this permit;
- (c) Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of

receipt of a billing. Pursuant 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

B.25 Advanced Source Modification Approval [326 IAC 2-7-5(16)] [326 IAC 2-7-10.5]

- (a) The requirements to obtain a source modification approval under 326 IAC 2-7-10.5 or a permit modification under 326 IAC 2-7-12 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3.
- (b) Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from the date of issuance of the permit, or if during the construction of work is suspended for a continuous period of one (1) year or more.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period, as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2][326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute, rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to

thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.8 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality

100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emissions units compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.11 Maintenance of Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

- (a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less often than once an hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does require the certification by the "responsible official" as defined by 326 IAC 2-

7-1(34).

- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP).

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.15 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole of information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:
 - (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and

- (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :
 - (A) Reasonable response steps that may be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to take reasonable response steps may constitute a violation of the permit.
- (c) Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:
 - (1) A false reading occurs due to the malfunction of the monitoring equipment. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.
- (f) At its discretion, IDEM may excuse the Permittee's failure to perform the monitoring and record keeping as required by Section D, if the Permittee provides adequate justification and documents that such failures do not exceed five percent (5%) of the operating time in any quarter.

Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.

**C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]**

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
 - (1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years or calendar quarters.

Stratospheric Ozone Protection

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS
Alternative Operating Scenario 1 for Printing Stations Using Compliant (i.e., Water-based) Materials

Facility Description [326 IAC 2-7-5(15)] - The following packaging rotogravure printing operations:

- (1) one (1) ten (10) station packaging rotogravure printing press identified as Press #1 (ten stations: P1U1 through P1U10), constructed in May of 1990, with a maximum line speed of 840 feet per minute (ft/min) when printing with ink and 740 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system with a total heat input rate of 7.76 million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) emissions from P1U1-P1U10 are controlled by one of the following:
 - (a) a single catalytic oxidizing incinerator identified as OXD#1 exhausting through one (1) stack (S/V ID: S-OXD1); or
 - (b) a single catalytic oxidizing incinerator identified as OXD#2 exhausting through one (1) stack (S/V ID: S-OXD2); or
 - (c) two (2) catalytic oxidizing incinerators configured in parallel, respectively identified as OXD#1 and OXD#2, with each incinerator exhausting through one (1) stack (S/V ID: S-OXD1 and S-OXD2), respectively.
- (2) one (1) nine (9) station packaging rotogravure printing press identified as Press #2 (nine stations: P2U1 through P2U9), constructed in April of 1991, with a maximum line speed of 840 feet per minute (ft/min) when printing with ink and 740 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system with a total heat input rate of 7.76 million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) emissions from P2U1-P2U9 are controlled by one of the following:
 - (a) a single catalytic oxidizing incinerator identified as OXD#2 exhausting through one (1) stack (S/V ID: S-OXD2); or
 - (b) a single catalytic oxidizing incinerator identified as OXD #5 exhausting through one (1) stack (S/V ID: S-OXD5); or
 - (c) two (2) catalytic oxidizing incinerators configured in parallel, respectively identified as OXD#2 and OXD#5, with each incinerator exhausting through one (1) stack (S/V ID: S-OXD2 and S-OXD5), respectively.
- (3) one (1) eight (8) station packaging rotogravure printing press identified as Press #3 (eight stations: P3U1 through P3U8), constructed in April of 1997, with a maximum line speed of 800 ft/min when printing with ink and 700 ft/min when printing with ink and adhesive. The volatile organic compound (VOC) emissions from P3U1-P3U8 are controlled by one catalytic oxidizing incinerator identified as OXD#5 exhausting through one (1) stack (S/V ID: S-OXD5).
- (4) one (1) eight (8) station packaging rotogravure printing press identified as Press #4 (eight stations: P4U1 through P4U8), constructed in January of 1997, with a maximum line speed of 800 feet per minute (ft/min) when printing with ink and 700 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system with a total heat input rate of twelve (12) million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) emissions from P4U1-P4U8 are controlled by one of the following:
 - (a) a single catalytic oxidizing incinerator identified as OXD#3 exhausting through one (1) stack (S/V ID: S-OXD3); or
 - (b) a single thermal oxidizing incinerator identified as OXD#4 exhausting through one (1) stack (S/V ID: S-OXD4); or

- (c) catalytic and thermal oxidizing incinerators configured in parallel, respectively identified as OXD#3 and OXD#4, with each incinerator exhausting through one (1) stack (S/V ID: S-OXD3 and S-OXD4), respectively.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Graphic Arts Operations [326 IAC 8-5-5]

Pursuant to 326 IAC 8-5-5 (Graphic Arts Operations), the Permittee may not cause, allow, or permit the operation of the facility unless the Permittee uses one of the following types of compliant coatings:

- (a) The volatile fraction of the ink, as it is applied to the substrate, contains twenty-five percent (25%) by volume or less of VOC, and seventy-five percent (75%) by volume or more of water; or
- (b) The ink as it is applied to the substrate, less water, contains sixty percent (60%) by volume or more nonvolatile material; or
- (c) The ink, as applied to the substrate, meets an emission limit of five-tenths (0.5) pounds of VOC per pound of solids in the ink.

D.1.2 General Provisions Relating to HAPs [326 IAC 20-1-1] [40 CFR Part 63, Subpart A] [326 IAC 2-4.1]

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section, as specified in Table 1 of 40 CFR 63, Subpart KK.

D.1.3 Printing and Publishing Industry NESHAP [326 IAC 20-18-1] [40 CFR Part 63, Subpart KK] [326 IAC 2-4.1]

This facility is subject to 40 CFR 63, Subpart KK, which is incorporated by reference as 326 IAC 20-18-1. A copy of this rule is attached. The Permittee shall comply with all applicable provisions of this rule on and after May 30, 1999.

- (a) The four (4) packaging rotogravure printing presses (P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U8) shall limit emissions to no more than four (4) percent of the mass of inks, coatings, varnishes, adhesives, primers, solvents, reducers, thinners, and other materials applied for the month.
- (b) Pursuant to 40 CFR 63.825(b)(1), to demonstrate compliance with this standard, the Permittee shall demonstrate that each ink, coating, varnish, adhesive, primer, solvent, diluent, reducer, thinner, and other material applied during the month contains no more than 0.04 weight-fraction organic HAP, on an as-purchased basis, as determined in accordance with Condition D.1.7(a).
- (c) The Permittee shall determine the organic HAP emissions for the affected source for the month by summing all organic HAP emissions calculated according to Condition D.1.7(b). The source is in compliance for the month if the total mass of organic HAP emitted by the source was not more than five percent of the total mass of organic HAP applied by the source. The total mass of organic HAP applied by the affected source in the month shall be determined by the Permittee using the following equation:

$$H = \sum_{i=1}^3 M_i C_{hi} + \sum_{j=1}^3 M_j C_{hj}$$

where the symbols of this equation are defined in 40 CFR 63.822(b).

D.1.4 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

The source-wide potential to emit VOC is limited to less than 250 tons per year to be a minor source under 326 IAC 2-2 (PSD) and 40 CFR 52.21. The total input VOC, including coatings, dilution solvents, and cleaning solvents, to Presses #1 through #4 (emission units P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U8) shall be limited to 3,458 tons per twelve (12) consecutive month period. VOC emissions from each press shall be controlled by a capture and incineration system that achieves a minimum overall VOC control efficiency of 94%. This usage limitation will then be equivalent to a VOC emission limitation of 207.5 tons per year.

The above emission limits including VOC limits from Alternative Operating Scenarios 2 through 10 and VOC emissions from natural gas combustion, solvent degreasing and the insignificant activities will limit source-wide VOC emissions to less than 250 tons per year.

D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and the control devices.

D.1.6 Enforcement Action [Agreed Order A-3820]

The Permittee shall comply with Agreed Order #A-3820, effective November 30, 1998. The Agreed Order is effective for a period of four (4) years from the Effective Date of the Agreed Order.

Compliance Determination Requirements

D.1.7 Testing Requirements [40 CFR Part 63, Subpart KK] [326 IAC 2-4.1] [326 IAC 20-18-1]

Pursuant to the Printing and Publishing Industry NESHAP, the Permittee shall comply with the following requirements:

- (a) Pursuant to 40 CFR 63.827(b)(2), the Permittee shall determine the organic HAP weight fraction of each ink, coating, varnish, adhesive, primer, solvent, thinner, reducer, diluent, and other material applied by following the procedure below and shall use this value for the organic HAP content for all compliance purposes.
 - (1) The Permittee shall determine the volatile matter and solids weight-fraction of each ink, coating, varnish, adhesive, primer, solvent, reducer, thinner, diluent, and other material applied using Method 24 of 40 CFR part 60, appendix A. The Method 24 determination may be performed by the manufacturer of the material and the results provided to the Permittee.
 - (2) If these values cannot be determined using Method 24, the Permittee shall submit an alternative technique for determining their values for approval by the Administrator.
 - (3) The Permittee may rely on formulation data, subject to the following, in accordance with the provisions of 40 CFR 63.827(c)(3):

- (A) The Permittee may determine the volatile matter content of materials based on formulation data, and may rely on volatile matter content data provided by material suppliers; and
 - (B) In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR part 60, appendix A, the applicable test method shall govern, unless after consultation, the Permittee can demonstrate to the satisfaction of the enforcement agency that the formulation data are correct.
- (b) Pursuant to 40 CFR 63.825(g), the Permittee shall determine the mass of organic HAP emitted using the following procedure:
- (1) Determine the sum of the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on intermittently-controllable work stations in bypass mode and the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on never-controlled work stations during the month, M_{Bi} .
 - (2) Determine the sum of the mass of all solvents, reducers, thinners, and other diluents which are applied on intermittently-controllable work stations in bypass mode and the mass of all solvents, reducers, thinners, and other diluents which are applied on never-controlled work stations during the month, M_{Bj} .
 - (3) Determine the sum of the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on intermittently-controllable work stations in controlled mode and the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on always-controlled work stations during the month, M_{Ci} .
 - (4) Determine the sum of the mass of all solvents, reducers, thinners, and other diluents which are applied on intermittently-controllable work stations in controlled mode and the mass of all solvents, reducers, thinners, and other diluents which are applied on always-controlled work stations during the month, M_{Cj} .
 - (5) Calculate the organic HAP emitted during the month using the following equation:

$$H = \left[\sum_{i=1}^p M_{Ci} C_{hi} + \sum_{j=1}^q M_{Cj} C_{hj} \right] * \left[1 - \left(\frac{E}{100} * \frac{F}{100} \right) \right] + \left[\sum_{i=1}^p M_{Bi} C_{hi} + \sum_{j=1}^q M_{Bj} C_{hj} \right]$$

where the symbols of this equation are defined in 40 CFR 63.822 (Definitions).

D.1.8 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.4 shall be determined pursuant to 326 IAC 8-1-2(a) and 326 IAC 8-1-4(a)(3) using formulation data supplied by the coating manufacturer.

D.1.9 VOC Emissions

Compliance with Condition D.1.4 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the twelve (12) month period.

D.1.10 Volatile Organic Compounds (VOC) Control

- (a) The catalytic and thermal oxidizers controlling VOC emissions from Presses #1 through #4 (emission units P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U8) shall be in operation at all times that these units are in operation to ensure compliance with condition D.1.4.
- (b) The catalytic oxidizing incinerator identified as OXD#1 shall maintain a minimum operating temperature of 650°F during operation or a temperature that has been determined from the most recent compliant stack tests to maintain compliance with condition D.1.4.
- (c) The catalytic oxidizing incinerators identified as OXD#2, and OXD#3 shall each maintain a minimum operating temperature of 600°F during operation or a temperature that has been determined from the most recent compliant stack tests to maintain compliance with condition D.1.4.
- (d) The thermal oxidizing incinerator identified as OXD #4 shall maintain a minimum operating temperature of 1,500°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain compliance with condition D.1.4.
- (e) The catalytic oxidizing incinerator identified as OXD #5 shall maintain a minimum operating temperature of 600°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain compliance with condition D.1.4.

Note: The use of the oxidizers to control VOC emissions from Presses #1 through #4 to comply with the PSD minor VOC emission limitation was voluntarily proposed by the source. Therefore, the source may apply for a modification to remove the requirement to operate the oxidizers at all times that any of the presses are in operation under this Alternative Operating Scenario at any time if compliance with the PSD minor VOC emission limit can be achieved by other means.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.11 Parametric Monitoring

A continuous monitoring system shall be calibrated, maintained, and operated on each of the oxidizers for measuring operating temperature. The output of these systems shall be recorded, and the temperature for each oxidizer shall be greater than or equal to the temperature used to demonstrate compliance during the most recent compliance stack test.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.12 Contemporaneous Log for Alternate Operating Scenarios [326 IAC 2-7-5(9)]

- (a) Pursuant to 326 IAC 2-7-5(9)(A), contemporaneously with making a change from one (1) alternative operating scenario to another, the Permittee shall make a record in a log at the permitted facility of the scenario under which it is operating. The record should state the alternative operating scenario for each station, since different stations at the same press may be operating under different scenarios.
- (b) The records required in paragraph (a) of this condition shall be maintained in accordance

with the requirements of Condition C.20 and 326 IAC 8-1-9(c).

D.1.13 Record keeping Requirements [326 IAC 8-1-10]

- (a) Pursuant to 326 IAC 8-1-10(c) (Compliance Certification, Record Keeping and Reporting Requirements for Certain Coating Facilities Using Compliant Coatings), upon changing the method of compliance for an existing coating facility from control devices (326 IAC 8-5-5(c)(3)(B)) to the use of compliant coatings (326 IAC 8-5-5(c)(1), (2), or (4)), the Permittee shall for each coating facility and for each coating used collect and record each day and maintain all of the following information:
 - (1) The name and identification number of each coating, as applied;
 - (2) The mass of VOC (excluding water and exempt compounds) per volume of coating for each coating, as applied, or the VOC content of each coating, as applied, expressed in units necessary to determine compliance;
 - (3) As new compliant coatings are added to a coating facility, the records required by this condition shall be updated to include the new coating; and
 - (4) If use of a coating is discontinued, the records required by this section shall be maintained consistent with 326 IAC 8-1-9(c).
- (b) The records required in paragraph (a) of this condition shall be maintained in accordance with the requirements of Condition C.20 and 326 IAC 8-1-9(c).

D.1.14 Record Keeping Requirements [40 CFR 63.829] [326 IAC 2-4.1] [326 IAC 20-18-1]

- (a) Pursuant to the Printing and Publishing Industry NESHAP, the Permittee shall maintain records of all measurements needed to demonstrate compliance with Condition D.1.3 on a monthly basis. These records shall include at a minimum the following specified in 40 CFR 63.10(b)(2) (General Provisions) that are applicable:
 - (1) All required measurements needed to demonstrate compliance with Condition D.1.3 (including, but not limited to, 15-minute averages of CMS data, raw performance testing measurements, raw performance evaluation measurements, control device and capture system operating parameter data, material usage, HAP usage, volatile matter usage, and solids usage that support data that the source is required to report); and
 - (2) All documentation supporting initial notifications of compliance status under 40 CFR 63.9 (General Provisions).
- (b) The records required in paragraph (a) of this condition shall be maintained in accordance with the following requirements of 40 CFR 63.10(b)(1) (General Provisions):
 - (1) The Permittee shall maintain files of all information (including all reports and notifications) required by this rule recorded in a form suitable and readily available for expeditious inspection and review.
 - (2) The files shall be retained for at least five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent two years of data shall be retained on site. The

remaining three years of data may be retained off site.

- (3) Such files may be maintained on microfilm, on a computer, on computer floppy disks, on magnetic tape disks, or on microfiche.

D.1.15 Record Keeping Requirements

- (a) To document compliance with Condition D.1.4, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limit and/or the VOC emission limit established in Condition D.1.4.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;
 - (2) A log of the dates of use;
 - (3) The total VOC usage for each month at each press;
 - (4) The weight of VOCs emitted for each compliance period for each press; and
 - (5) The continuous temperature records for the catalytic and thermal incinerators and the temperature used to demonstrate compliance during the most recent compliance stack test.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.16 Reporting Requirements [326 IAC 8-1-10]

- (a) Pursuant to 326 IAC 8-5-5(c)(1), (2), or (4) and 326 IAC 8-1-10(d), the Permittee shall notify IDEM, OAQ in either of the following instances:
 - (1) Any record showing use of any noncompliant coatings shall be reported by submitting a copy of the record to IDEM, OAQ within thirty (30) days following use; such record shall also be submitted with the quarterly compliance monitoring report attached to this permit. The following information shall accompany each submittal:
 - (A) Name and location of the coating facility;
 - (B) Time, date, and duration of the noncompliance; and
 - (C) Corrective action taken.
 - (2) At least thirty (30) calendar days before changing the method of compliance from the use of compliant coatings (326 IAC 8-5-5(c)(1), (2), or (4)) to control devices (326 IAC 8-5-5(c)(3)(B)), the Permittee shall comply with all requirements of 326 IAC 8-1-12(b) of this rule, respectively. Upon changing the method of compliance for a coating facility from the use of compliant coatings to control devices, the Permittee shall comply with all requirements of 326 IAC 8-1-12.

- (b) Pursuant to 326 IAC 8-1-10(b), upon changing the method of compliance for an existing coating facility from control devices (326 IAC 8-5-5(c)(3)(B)) to the use of compliant coatings (326 IAC 8-5-5(c)(1), (2), or (4)), the Permittee shall certify to IDEM, OAQ that the coating facility is in compliance with the requirements of 326 IAC 8-1-10. The certification shall include the following:
 - (1) The name and location of the source;
 - (2) The name, address, and telephone number of the person responsible for the source;
 - (3) Identification of each VOC emitting coating facility and identification of the applicable emission limitation;
 - (4) The name and identification number of each coating, as applied, used at each coating facility; and
 - (5) The mass of VOC (excluding water and exempt compounds) per volume of coating and the volume of each coating, as applied.

D.1.17 Reporting Requirements

- (a) A quarterly summary of the information to document compliance with Condition D.1.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. This quarterly summary report can be submitted in the same summary report required for Alternative Operating Scenarios 2 through 10 in Conditions D.2.17(a), D.3.17(a), D.4.17(a), D.5.17(a), D.6.17(a), D.7.21(a), D.8.21(a), D.9.21(a), and D.10.21(a). The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) Pursuant to 326 IAC 2-7-5(9)(C), the Permittee shall include a summary of the records required under Condition D.1.12 in the annual compliance certification submitted under 326 IAC 2-7-6(5) and Condition B.11.

D.1.18 Reporting Requirements [40CFR 63.830] [326 IAC 2-4.1] [326 IAC 20-18-1]

Pursuant to the Printing and Publishing Industry NESHAP, the Permittee shall submit the reports and plans listed below to the following addresses:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (a) A Notification of Compliance Status specified in 40 CFR 63.9(h) (General Provisions). This

notification can be submitted in the same notification required for Alternative Operating Scenarios 2 through 10 in Conditions D.2.18(a), D.3.18(a), D.4.18(a), D.5.18(a), D.6.18(a), D.7.22(b), D.8.22(b), D.9.22(b), and D.10.22(b).

- (b) A summary report specified in 40 CFR 63.10(e)(3) (General Provisions) shall be submitted on a semi-annual basis (i.e., once every six-month period). In addition to a report of operating parameter exceedances as required by 40 CFR 63.10(e)(3)(i) (General Provisions), the summary report shall include exceedances of the standards in Condition D.1.3. This summary report can be submitted in the same summary report required for Alternative Operating Scenarios 2 through 10 in Conditions D.2.18(b), D.3.18(b), D.4.18(b), D.5.18(b), D.6.18(b), D.7.22(e), D.8.22(e), D.9.22(e), and D.10.22(e).

- (1) one (1) ten (10) station packaging rotogravure printing press identified as Press #1 (ten stations: P1U1 through P1U10), constructed in May of 1990, with a maximum line speed of 840 feet per minute (ft/min) when printing with ink and 740 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system with a total heat input rate of 7.76 million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) emissions from P1U1-P1U10 are controlled by one of the following:
 - (a) a single catalytic oxidizing incinerator identified as OXD#1 exhausting through one (1) stack (S/V ID: S-OXD1); or
 - (b) a single catalytic oxidizing incinerator identified as OXD#2 exhausting through one (1) stack (S/V ID: S-OXD2); or
 - (c) two (2) catalytic oxidizing incinerators configured in parallel, respectively identified as OXD#1 and OXD#2, with each incinerator exhausting through one (1) stack (S/V ID: S-OXD1 and S-OXD2), respectively.
- (2) one (1) nine (9) station packaging rotogravure printing press identified as Press #2 (nine stations: P2U1 through P2U9), constructed in April of 1991, with a maximum line speed of 840 feet per minute (ft/min) when printing with ink and 740 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system with a total heat input rate of 7.76 million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) emissions from P2U1-P2U9 are controlled by one of the following:
 - (a) a single catalytic oxidizing incinerator identified as OXD#2 exhausting through one (1) stack (S/V ID: S-OXD2); or
 - (b) a single catalytic oxidizing incinerator identified as OXD #5 exhausting through one (1) stack (S/V ID: S-OXD5); or
 - (c) two (2) catalytic oxidizing incinerators configured in parallel, respectively identified as OXD#2 and OXD#5, with each incinerator exhausting through one (1) stack (S/V ID: S-OXD2 and S-OXD5), respectively.
- (3) one (1) eight (8) station packaging rotogravure printing press identified as Press #3 (eight stations: P3U1 through P3U8), constructed in April of 1997, with a maximum line speed of 800 ft/min when printing with ink and 700 ft/min when printing with ink and adhesive. The volatile organic compound (VOC) emissions from P3U1-P3U8 are controlled by one catalytic oxidizing incinerator identified as OXD#5 exhausting through one (1) stack (S/V ID: S-OXD5).
- (4) one (1) eight (8) station packaging rotogravure printing press identified as Press #4 (eight stations: P4U1 through P4U8), constructed in January of 1997, with a maximum line speed of 800 feet per minute (ft/min) when printing with ink and 700 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system with a total heat input rate of twelve (12) million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) emissions from P4U1-P4U8 are controlled by one of the following:
 - (a) a single catalytic oxidizing incinerator identified as OXD#3 exhausting through one (1) stack (S/V ID: S-OXD3); or
 - (b) a single thermal oxidizing incinerator identified as OXD#4 exhausting through one (1) stack (S/V ID: S-OXD4); or

- (c) catalytic and thermal oxidizing incinerators configured in parallel, respectively identified as OXD#3 and OXD#4, with each incinerator exhausting through one (1) stack (S/V ID: S-OXD3 and S-OXD4), respectively.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Graphic Arts Operations [326 IAC 8-5-5]

Pursuant to 326 IAC 8-5-5 (Graphic Arts Operations), the Permittee may not cause, allow, or permit the operation of the facility unless the Permittee uses one of the following types of compliant coatings:

- (a) The volatile fraction of the ink, as it is applied to the substrate, contains twenty-five percent (25%) by volume or less of VOC, and seventy-five percent (75%) by volume or more of water; or
- (b) The ink as it is applied to the substrate, less water, contains sixty percent (60%) by volume or more nonvolatile material; or
- (c) The ink, as applied to the substrate, meets an emission limit of five-tenths (0.5) pounds of VOC per pound of solids in the ink.

D.2.2 General Provisions Relating to HAPs [326 IAC 20-1-1] [40 CFR Part 63, Subpart A] [326 IAC 2-4.1]

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section, as specified in Table 1 of 40 CFR 63, Subpart KK.

D.2.3 Printing and Publishing Industry NESHAP [326 IAC 20-18-1] [40 CFR Part 63, Subpart KK] [326 IAC 2-4.1]

This facility is subject to 40 CFR 63, Subpart KK, which is incorporated by reference as 326 IAC 20-18-1. A copy of this rule is attached. The Permittee shall comply with all applicable provisions of this rule on and after May 30, 1999.

- (a) The four (4) packaging rotogravure printing presses (P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U8) shall limit emissions to no more than four (4) percent of the mass of inks, coatings, varnishes, adhesives, primers, solvents, reducers, thinners, and other materials applied for the month.
- (b) Pursuant to 40 CFR 63.825(b)(2), to demonstrate compliance with this standard, the Permittee shall, for each press, demonstrate that each ink, coating, varnish, adhesive, primer, and other solids-containing material applied during the month contains no more than 0.04 weight-fraction organic HAP, on a monthly average as-applied basis as determined in accordance with 40 CFR 63.825(b)(2)(i)-(ii). The Permittee shall calculate the as-applied HAP content of materials which are reduced, thinned, or diluted prior to application as follows:
 - (1) Determine the organic HAP content of each ink, coating, varnish, adhesive, primer, solvent, diluent, reducer, thinner, and other material applied on an as-purchased basis in accordance with 40 CFR 63.827(b)(2) and condition D.2.7(a).

- (2) Calculate the monthly average as-applied organic HAP content, C_{ahi} of each ink, coating, varnish, adhesive, primer, and other solids-containing material using the following equation:

$$C_{ahi} = \frac{\left(C_{hi}M_i + \sum_{j=1}^q C_{hij}M_{ij} \right)}{M_i + \sum_{j=1}^q M_{ij}}$$

where the symbols of this equation are defined in 40 CFR 63.822(b).

D.2.4 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

The source-wide potential to emit VOC is limited to less than 250 tons per year to be a minor source under 326 IAC 2-2 (PSD) and 40 CFR 52.21. The total input VOC, including coatings, dilution solvents, and cleaning solvents, to Presses #1 through #4 (emission units P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U8) shall be limited to 3,458 tons per twelve (12) consecutive month period. VOC emissions from each press shall be controlled by a capture and incineration system that achieves a minimum overall VOC control efficiency of 94%. This usage limitation will then be equivalent to a VOC emission limitation of 207.5 tons per year.

The above emission limits including VOC limits from Alternative Operating Scenarios 1 and 3 through 10 and VOC emissions from natural gas combustion, solvent degreasing and the insignificant activities will limit source-wide VOC emissions to less than 250 tons per year.

D.2.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and the control devices.

D.2.6 Enforcement Action [Agreed Order A-3820]

The Permittee shall comply with Agreed Order #A-3820, effective November 30, 1998. The Agreed Order is effective for a period of four (4) years from the Effective Date of the Agreed Order.

Compliance Determination Requirements

D.2.7 Testing Requirements [40 CFR Part 63, Subpart KK] [326 IAC 20-18-1] [326 IAC 2-4.1]

Pursuant to the Printing and Publishing Industry NESHAP, the Permittee shall comply with the following requirements:

- (a) Pursuant to 40 CFR 63.827(b)(2), the Permittee shall determine the organic HAP weight fraction of each ink, coating, varnish, adhesive, primer, solvent, thinner, reducer, diluent, and other material applied by following the procedure in 40 CFR 63.827(c)(2) included below and shall use this value for the organic HAP content for all compliance purposes.
- (1) The Permittee shall determine the volatile matter and solids weight-fraction of each ink, coating, varnish, adhesive, primer, solvent, reducer, thinner, diluent, and other material applied using Method 24 of 40 CFR part 60, appendix A. The Method 24 determination may be performed by the manufacturer of the material and the

results provided to the Permittee.

- (2) If these values cannot be determined using Method 24, the Permittee shall submit an alternative technique for determining their values for approval by the Administrator.
- (3) The Permittee may rely on formulation data, subject to the following, in accordance with the provisions of 40 CFR 63.827(c)(3):
 - (A) The Permittee may determine the volatile matter content of materials based on formulation data, and may rely on volatile matter content data provided by material suppliers; and
 - (B) In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR part 60, appendix A, the applicable test method shall govern, unless after consultation, the Permittee can demonstrate to the satisfaction of the enforcement agency that the formulation data are correct.
- (b) Pursuant to 40 CFR 63.825(g), the Permittee shall determine the mass of organic HAP emitted using the following procedure:
 - (1) Determine the sum of the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on intermittently-controllable work stations in bypass mode and the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on never-controlled work stations during the month, M_{Bi} .
 - (2) Determine the sum of the mass of all solvents, reducers, thinners, and other diluents which are applied on intermittently-controllable work stations in bypass mode and the mass of all solvents, reducers, thinners, and other diluents which are applied on never-controlled work stations during the month, M_{Bj} .
 - (3) Determine the sum of the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on intermittently-controllable work stations in controlled mode and the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on always-controlled work stations during the month, M_{Ci} .
 - (4) Determine the sum of the mass of all solvents, reducers, thinners, and other diluents which are applied on intermittently-controllable work stations in controlled mode and the mass of all solvents, reducers, thinners, and other diluents which are applied on always-controlled work stations during the month, M_{Cj} .
 - (5) Calculate the organic HAP emitted during the month using the following equation:

$$H = \left[\sum_{i=1}^p M_{Ci} C_{hi} + \sum_{j=1}^q M_{Cj} C_{hj} \right] * \left[1 - \left(\frac{E}{100} * \frac{F}{100} \right) \right] + \left[\sum_{i=1}^p M_{Bi} C_{hi} + \sum_{j=1}^q M_{Bj} C_{hj} \right]$$

where the symbols of this equation are defined in 40 CFR 63.822 (Definitions).

D.2.8 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.2.1 and D.2.4 shall be determined pursuant to 326 IAC 8-1-2(a) and 326 IAC 8-1-4(a)(3) using formulation data supplied by the coating manufacturer.

D.2.9 VOC Emissions

Compliance with Condition D.2.4 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the twelve (12) month period.

D.2.10 Volatile Organic Compounds (VOC) Control

- (a) The catalytic and thermal oxidizers controlling VOC emissions from Presses #1 through #4 (emission units P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U8) shall be in operation at all times that these units are in operation to ensure compliance with condition D.2.4.
- (b) The catalytic oxidizing incinerator identified as OXD#1 shall maintain a minimum operating temperature of 650°F during operation or a temperature that has been determined from the most recent compliant stack tests to maintain compliance with condition D.2.4.
- (c) The catalytic oxidizing incinerators identified as OXD#2, and OXD#3 shall each maintain a minimum operating temperature of 600°F during operation or a temperature that has been determined from the most recent compliant stack tests to maintain compliance with condition D.2.4.
- (d) The thermal oxidizing incinerator identified as OXD#4 shall maintain a minimum operating temperature of 1,500°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain compliance with condition D.2.4.
- (e) The catalytic oxidizing incinerator identified as OXD#5 shall maintain a minimum operating temperature of 600°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain compliance with condition D.2.4.

Note: The use of the oxidizers to control VOC emissions from Presses #1 through #4 to comply with the PSD minor VOC emission limitation was voluntarily proposed by the source. Therefore, the source may apply for a modification to remove the requirement to operate the oxidizers at all times that any of the presses are in operation under this Alternative Operating Scenario at any time if compliance with the PSD minor VOC emission limit can be achieved by other means.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.11 Parametric Monitoring

A continuous monitoring system shall be calibrated, maintained, and operated on each of the oxidizers for measuring operating temperature. The output of these systems shall be recorded, and the temperature for each oxidizer shall be greater than or equal to the temperature used to demonstrate compliance during the most recent compliance stack test.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.12 Contemporaneous Log for Alternate Operating Scenarios [326 IAC 2-7-5(9)]

- (a) Pursuant to 326 IAC 2-7-5(9)(A), contemporaneously with making a change from one alternative operating scenario to another, the Permittee shall make a record in a log at the permitted facility of the scenario under which it is operating. The record should state the alternative operating scenario for each station, since different stations at the same press may be operating under different scenarios.
- (b) The records required in paragraph (a) of this condition shall be maintained in accordance with the requirements of Condition C.20 and 326 IAC 8-1-9(c).

D.2.13 Record keeping Requirements [326 IAC 8-1-10]

- (a) Pursuant to 326 IAC 8-1-10(c) (Compliance Certification, Record Keeping and Reporting Requirements for Certain Coating Facilities Using Compliant Coatings), upon changing the method of compliance for an existing coating facility from control devices (326 IAC 8-5-5(c)(3)(B)) to the use of compliant coatings (326 IAC 8-5-5(c)(1), (2), or (4)), the Permittee shall for each coating facility and for each coating used collect and record each day and maintain all of the following information:
 - (1) The name and identification number of each coating, as applied;
 - (2) The mass of VOC (excluding water and exempt compounds) per volume of coating for each coating, as applied, or the VOC content of each coating, as applied, expressed in units necessary to determine compliance;
 - (3) As new compliant coatings are added to a coating facility, the records required by this condition shall be updated to include the new coating; and
 - (4) If use of a coating is discontinued, the records required by this section shall be maintained consistent with 326 IAC 8-1-9(c).
- (b) The records required in paragraph (a) of this condition shall be maintained in accordance with the requirements of Condition C.20 and 326 IAC 8-1-9(c).

D.2.14 Record Keeping Requirements [40 CFR 63.829] [326 IAC 20-18-1] [326 IAC 2-4.1]

- (a) Pursuant to the Printing and Publishing Industry NESHAP, the Permittee shall maintain records of all measurements needed to demonstrate compliance with Condition D.2.3 on a monthly basis. These records shall include at a minimum the following specified in 40 CFR 63.10(b)(2) (General Provisions) that are applicable:
 - (1) All required measurements needed to demonstrate compliance with Condition D.2.3 (including, but not limited to, 15-minute averages of CMS data, raw performance testing measurements, raw performance evaluation measurements, control device and capture system operating parameter data, material usage, HAP usage, volatile matter usage, and solids usage that support data that the source is required to report); and
 - (2) All documentation supporting initial notifications of compliance status under 40 CFR 63.9 (General Provisions).
- (b) The records required in paragraph (a) of this condition shall be maintained in accordance with the following requirements of 40 CFR 63.10(b)(1) (General Provisions):

- (1) The Permittee shall maintain files of all information (including all reports and notifications) required by this rule recorded in a form suitable and readily available for expeditious inspection and review.
- (2) The files shall be retained for at least five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent two years of data shall be retained on site. The remaining three years of data may be retained off site.
- (3) Such files may be maintained on microfilm, on a computer, on computer floppy disks, on magnetic tape disks, or on microfiche.

D.2.15 Record Keeping Requirements

- (a) To document compliance with Condition D.2.4, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limit and/or the VOC emission limit established in Condition D.2.4.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;
 - (2) A log of the dates of use;
 - (3) The total VOC usage for each month at each press while operating the incinerators;
 - (4) The weight of VOCs emitted for each compliance period for each press; and
 - (5) The continuous temperature records for the catalytic and thermal incinerators and the temperature used to demonstrate compliance during the most recent compliance stack test.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.16 Reporting Requirements [326 IAC 8-1-10]

- (a) Pursuant to 326 IAC 8-5-5(c)(1), (2), or (4) and 326 IAC 8-1-10(d), the Permittee shall notify IDEM, OAQ in either of the following instances:
 - (1) Any record showing use of any noncompliant coatings shall be reported by submitting a copy of the record to IDEM, OAQ within thirty (30) days following use; such record shall also be submitted with the quarterly compliance monitoring report attached to this permit. The following information shall accompany each submittal:
 - (A) Name and location of the coating facility;
 - (B) Time, date, and duration of the noncompliance; and
 - (C) Corrective action taken.

- (2) At least thirty (30) calendar days before changing the method of compliance from the use of compliant coatings (326 IAC 8-5-5(c)(1), (2), or (4)) to control devices (326 IAC 8-5-5(c)(3)(B)), the Permittee shall comply with all requirements of 326 IAC 8-1-12(b) of this rule, respectively. Upon changing the method of compliance for a coating facility from the use of compliant coatings to control devices, the Permittee shall comply with all requirements of 326 IAC 8-1-12.
- (b) Pursuant to 326 IAC 8-1-10(b), upon changing the method of compliance for an existing coating facility from control devices (326 IAC 8-5-5(c)(3)(B)) to the use of compliant coatings (326 IAC 8-5-5(c)(1), (2), or (4)), the Permittee shall certify to IDEM, OAQ that the coating facility is in compliance with the requirements of 326 IAC 8-1-10. The certification shall include the following:
 - (1) The name and location of the source;
 - (2) The name, address, and telephone number of the person responsible for the source;
 - (3) Identification of each VOC emitting coating facility and identification of the applicable emission limitation;
 - (4) The name and identification number of each coating, as applied, used at each coating facility; and
 - (5) The mass of VOC (excluding water and exempt compounds) per volume of coating and the volume of each coating, as applied.

D.2.17 Reporting Requirements

- (a) A quarterly summary of the information to document compliance with Condition D.2.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. This quarterly summary report can be submitted in the same summary report required for Alternative Operating Scenarios 1 and 3 through 10 in Conditions D.1.17(a), D.3.17(a), D.4.17(a), D.5.17(a), D.6.17(a), D.7.21(a), D.8.21(a), D.9.21(a), and D.10.21(a). The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) Pursuant to 326 IAC 2-7-5(9)(C), the Permittee shall include a summary of the records required under Condition D.2.12 in the annual compliance certification submitted under 326 IAC 2-7-6(5) and Condition B.11.

D.2.18 Reporting Requirements [40CFR 63.830] [326 IAC 20-18-1] [326 IAC 2-4.1]

Pursuant to the Printing and Publishing Industry NESHAP, the Permittee shall submit the reports and plans listed below to the following addresses:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (a) A Notification of Compliance Status specified in 40 CFR 63.9(h) (General Provisions). This notification can be submitted in the same notification required for Alternative Operating Scenarios 1 and 3 through 10 in Conditions D.1.18(a), D.3.18(a), D.4.18(a), D.5.18(a), D.6.18(a), D.7.22(b), D.8.22(b), D.9.22(b), and D.10.22(b).
- (b) A summary report specified in 40 CFR 63.10(e)(3) (General Provisions) shall be submitted on a semi-annual basis (i.e., once every six-month period). In addition to a report of operating parameter exceedances as required by 40 CFR 63.10(e)(3)(i) (General Provisions), the summary report shall include exceedances of the standards in Condition D.1.3. This summary report can be submitted in the same summary report required for Alternative Operating Scenarios 1 and 3 through 10 in Conditions D.1.18(b), D.3.18(b), D.4.18(b), D.5.18(b), D.6.18(b), D.7.22(e), D.8.22(e), D.9.22(e), and D.10.22(e).

SECTION D.3 **FACILITY OPERATION CONDITIONS**
Alternative Operating Scenario 3 for Printing Stations Using Compliant (i.e., Water-based)
Materials

Facility Description [326 IAC 2-7-5(15)] - The following packaging rotogravure printing operations:

- (1) one (1) ten (10) station packaging rotogravure printing press identified as Press #1 (ten stations: P1U1 through P1U10), constructed in May of 1990, with a maximum line speed of 840 feet per minute (ft/min) when printing with ink and 740 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system with a total heat input rate of 7.76 million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) emissions from P1U1-P1U10 are controlled by one of the following:
 - (a) a single catalytic oxidizing incinerator identified as OXD#1 exhausting through one (1) stack (S/V ID: S-OXD1); or
 - (b) a single catalytic oxidizing incinerator identified as OXD#2 exhausting through one (1) stack (S/V ID: S-OXD2); or
 - (c) two (2) catalytic oxidizing incinerators configured in parallel, respectively identified as OXD#1 and OXD#2, with each incinerator exhausting through one (1) stack (S/V ID: S-OXD1 and S-OXD2), respectively.
- (2) one (1) nine (9) station packaging rotogravure printing press identified as Press #2 (nine stations: P2U1 through P2U9), constructed in April of 1991, with a maximum line speed of 840 feet per minute (ft/min) when printing with ink and 740 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system with a total heat input rate of 7.76 million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) emissions from P2U1-P2U9 are controlled by one of the following:
 - (a) a single catalytic oxidizing incinerator identified as OXD#2 exhausting through one (1) stack (S/V ID: S-OXD2); or
 - (b) a single catalytic oxidizing incinerator identified as OXD #5 exhausting through one (1) stack (S/V ID: S-OXD5); or
 - (c) two (2) catalytic oxidizing incinerators configured in parallel, respectively identified as OXD#2 and OXD#5, with each incinerator exhausting through one (1) stack (S/V ID: S-OXD2 and S-OXD5), respectively.
- (3) one (1) eight (8) station packaging rotogravure printing press identified as Press #3 (eight stations: P3U1 through P3U8), constructed in April of 1997, with a maximum line speed of 800 ft/min when printing with ink and 700 ft/min when printing with ink and adhesive. The volatile organic compound (VOC) emissions from P3U1-P3U8 are controlled by one catalytic oxidizing incinerator identified as OXD#5 exhausting through one (1) stack (S/V ID: S-OXD5).
- (4) one (1) eight (8) station packaging rotogravure printing press identified as Press #4 (eight stations: P4U1 through P4U8), constructed in January of 1997, with a maximum line speed of 800 feet per minute (ft/min) when printing with ink and 700 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system with a total heat input rate of twelve (12) million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) emissions from P4U1-P4U8 are controlled by one of the following:
 - (a) a single catalytic oxidizing incinerator identified as OXD#3 exhausting through one (1) stack (S/V ID: S-OXD3); or
 - (b) a single thermal oxidizing incinerator identified as OXD#4 exhausting through one (1) stack (S/V ID: S-OXD4); or

- (c) catalytic and thermal oxidizing incinerators configured in parallel, respectively identified as OXD#3 and OXD#4, with each incinerator exhausting through one (1) stack (S/V ID: S-OXD3 and S-OXD4), respectively.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Graphic Arts Operations [326 IAC 8-5-5]

Pursuant to 326 IAC 8-5-5 (Graphic Arts Operations), the Permittee may not cause, allow, or permit the operation of the facility unless the Permittee uses one of the following types of compliant coatings:

- (a) The volatile fraction of the ink, as it is applied to the substrate, contains twenty-five percent (25%) by volume or less of VOC, and seventy-five percent (75%) by volume or more of water; or
- (b) The ink as it is applied to the substrate, less water, contains sixty percent (60%) by volume or more nonvolatile material; or
- (c) The ink, as applied to the substrate, meets an emission limit of five-tenths (0.5) pounds of VOC per pound of solids in the ink.

D.3.2 General Provisions Relating to HAPs [326 IAC 20-1-1] [40 CFR Part 63, Subpart A] [326 IAC 2-4.1]

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section, as specified in Table 1 of 40 CFR 63, Subpart KK.

D.3.3 Printing and Publishing Industry NESHAP [326 IAC 20-18-1] [40 CFR Part 63, Subpart KK] [326 IAC 2-4.1]

This facility is subject to 40 CFR 63, Subpart KK, which is incorporated by reference as 326 IAC 20-18-1. A copy of this rule is attached. The Permittee shall comply with all applicable provisions of this rule on and after May 30, 1999.

- (a) The four (4) packaging rotogravure printing presses (P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U8) shall limit emissions to no more than four (4) percent of the mass of inks, coatings, varnishes, adhesives, primers, solvents, reducers, thinners, and other materials applied for the month; or to no more than 20 percent of the mass of solids applied for the month.
- (b) Pursuant to 40 CFR 63.825(b)(3)(i), to demonstrate compliance with this standard, the Permittee shall, for each press, demonstrate that each ink, coating, varnish, adhesive, primer, and other solids-containing material either:
 - (1) contains no more than 0.04 weight-fraction organic HAP, on a monthly average as-applied basis; or
 - (2) contains no more than 0.20 kg of organic HAP per kg of solids applied, on a monthly average as-applied basis.

- (c) Pursuant to 40 CFR 63.825(b)(3)(ii), the Permittee may demonstrate compliance in accordance with 40 CFR 63.825(b)(3)(ii) (A)-(C) as follows:
- (1) Use the following procedures in accordance with 40 CFR 63.825(b)(2) to determine which materials contain no more than 0.04 weight-fraction organic HAP, on a monthly average as-applied basis:
- (A) The Permittee shall calculate the as-applied HAP content of materials which are reduced, thinned, or diluted prior to application as follows:
- (i) Determine the organic HAP content of each ink, coating, varnish, adhesive, primer, solvent, diluent, reducer, thinner, and other material applied on an as-purchased basis in accordance with 40 CFR 63.827(b)(2) and condition D.1.9(a).
- (ii) Calculate the monthly average as-applied organic HAP content, C_{ahi} of each ink, coating, varnish, adhesive, primer, and other solids-containing material using the following equation:

$$C_{ahi} = \frac{\left(C_{hi}M_i + \sum_{j=1}^q C_{hij}M_{ij} \right)}{M_i + \sum_{j=1}^q M_{ij}}$$

where the symbols of this equation are defined in 40 CFR 63.822(b).

- (2) Determine the as-applied solids content following the procedure in 40 CFR 63.827(c)(2) and condition D.3.7(a) of all materials which do not meet the requirements of paragraph (b)(1) of this condition. The Permittee may calculate the monthly average as-applied solids content of materials which are reduced, thinned, or diluted prior to application, using the following equation:

$$C_{asi} = \frac{C_{si}M_i}{M_i + \sum_{j=1}^q M_{ij}}$$

where the symbols of this equation are defined in 40 CFR 63.822(b).

- (3) Calculate the as-applied organic HAP to solids ratio, H_{si} , for all materials which do not meet the requirements of paragraph (b)(1) of this condition, using the following equation:

$$H_{si} = \frac{C_{chi}}{C_{asi}}$$

where the symbols of this equation are defined in 40 CFR 63.822(b).

D.3.4 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

The source-wide potential to emit VOC is limited to less than 250 tons per year to be a minor source under 326 IAC 2-2 (PSD) and 40 CFR 52.21. The total input VOC, including coatings, dilution solvents, and cleaning solvents, to Presses #1 through #4 (emission units P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U8) shall be limited to 3,458 tons per twelve (12) consecutive month period. VOC emissions from each press shall be controlled by a capture and incineration system that achieves a minimum overall VOC control efficiency of 94%. This usage limitation will then be equivalent to a VOC emission limitation of 207.5 tons per year.

The above emission limits including VOC limits from Alternative Operating Scenarios 1, 2, and 4 through 10 and VOC emissions from natural gas combustion, solvent degreasing and the insignificant activities will limit source-wide VOC emissions to less than 250 tons per year.

D.3.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and the control devices.

D.3.6 Enforcement Action [Agreed Order A-3820]

The Permittee shall comply with Agreed Order #A-3820, effective November 30, 1998. The Agreed Order is effective for a period of four (4) years from the Effective Date of the Agreed Order.

Compliance Determination Requirements

D.3.7 Testing Requirements [40 CFR Part 63, Subpart KK] [326 IAC 20-18-1] [326 IAC 2-4.1]

Pursuant to the Printing and Publishing Industry NESHAP, the Permittee shall comply with the following requirements:

- (a) Pursuant to 40 CFR 63.827(b)(2), the Permittee shall determine the organic HAP weight fraction of each ink, coating, varnish, adhesive, primer, solvent, thinner, reducer, diluent, and other material applied by following the procedure in 40 CFR 63.827(c)(2) included below and shall use this value for the organic HAP content for all compliance purposes.
 - (1) The Permittee shall determine the volatile matter and solids weight-fraction of each ink, coating, varnish, adhesive, primer, solvent, reducer, thinner, diluent, and other material applied using Method 24 of 40 CFR part 60, appendix A. The Method 24 determination may be performed by the manufacturer of the material and the results provided to the Permittee.
 - (2) If these values cannot be determined using Method 24, the Permittee shall submit an alternative technique for determining their values for approval by the Administrator.
 - (3) The Permittee may rely on formulation data, subject to the following, in accordance with the provisions of 40 CFR 63.827(c)(3):

- (A) The Permittee may determine the volatile matter content of materials based on formulation data, and may rely on volatile matter content data provided by material suppliers; and
 - (B) In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR part 60, appendix A, the applicable test method shall govern, unless after consultation, the Permittee can demonstrate to the satisfaction of the enforcement agency that the formulation data are correct.
- (b) Pursuant to 40 CFR 63.825(g), the Permittee shall determine the mass of organic HAP emitted using the following procedure:
- (1) Determine the sum of the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on intermittently-controllable work stations in bypass mode and the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on never-controlled work stations during the month, M_{Bi} .
 - (2) Determine the sum of the mass of all solvents, reducers, thinners, and other diluents which are applied on intermittently-controllable work stations in bypass mode and the mass of all solvents, reducers, thinners, and other diluents which are applied on never-controlled work stations during the month, M_{Bj} .
 - (3) Determine the sum of the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on intermittently-controllable work stations in controlled mode and the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on always-controlled work stations during the month, M_{Ci} .
 - (4) Determine the sum of the mass of all solvents, reducers, thinners, and other diluents which are applied on intermittently-controllable work stations in controlled mode and the mass of all solvents, reducers, thinners, and other diluents which are applied on always-controlled work stations during the month, M_{Cj} .
 - (5) Calculate the organic HAP emitted during the month using the following equation:

$$H = \left[\sum_{i=1}^p M_{Ci} C_{hi} + \sum_{j=1}^q M_{Cj} C_{hj} \right] * \left[1 - \left(\frac{E}{100} * \frac{F}{100} \right) \right] + \left[\sum_{i=1}^p M_{Bi} C_{hi} + \sum_{j=1}^q M_{Bj} C_{hj} \right]$$

where the symbols of this equation are defined in 40 CFR 63.822 (Definitions).

D.3.8 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.3.1 and D.3.4 shall be determined pursuant to 326 IAC 8-1-2(a) and 326 IAC 8-1-4(a)(3) using formulation data supplied by the coating manufacturer.

D.3.9 VOC Emissions

Compliance with Condition D.3.4 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the twelve (12) month period.

D.3.10 Volatile Organic Compounds (VOC) Control

- (a) The catalytic and thermal oxidizers controlling VOC emissions from Presses #1 through #4 (emission units P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U8) shall be in operation at all times that these units are in operation to ensure compliance with condition D.3.4.
- (b) The catalytic oxidizing incinerator identified as OXD#1 shall maintain a minimum operating temperature of 650°F during operation or a temperature that has been determined from the most recent compliant stack tests to maintain compliance with condition D.3.4.
- (c) The catalytic oxidizing incinerators identified as OXD#2, and OXD#3 shall each maintain a minimum operating temperature of 600°F during operation or a temperature that has been determined from the most recent compliant stack tests to maintain compliance with condition D.3.4.
- (d) The thermal oxidizing incinerator identified as OXD #4 shall maintain a minimum operating temperature of 1,500°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain compliance with condition D.3.4.
- (e) The catalytic oxidizing incinerator identified as OXD #5 shall maintain a minimum operating temperature of 600°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain compliance with condition D.3.4.

Note: The use of the oxidizers to control VOC emissions from Presses #1 through #4 to comply with the PSD minor VOC emission limitation was voluntarily proposed by the source. Therefore, the source may apply for a modification to remove the requirement to operate the oxidizers at all times that any of the presses are in operation under this Alternative Operating Scenario at any time if compliance with the PSD minor VOC emission limit can be achieved by other means.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.3.11 Parametric Monitoring

A continuous monitoring system shall be calibrated, maintained, and operated on each of the oxidizers for measuring operating temperature. The output of these systems shall be recorded, and the temperature for each oxidizer shall be greater than or equal to the temperature used to demonstrate compliance during the most recent compliance stack test.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.12 Contemporaneous Log for Alternate Operating Scenarios [326 IAC 2-7-5(9)]

- (a) Pursuant to 326 IAC 2-7-5(9)(A), contemporaneously with making a change from one alternative operating scenario to another, the Permittee shall make a record in a log at the permitted facility of the scenario under which it is operating. The record should state the alternative operating scenario for each station, since different stations at the same press may be operating under different scenarios.
- (b) The records required in paragraph (a) of this condition shall be maintained in accordance

with the requirements of Condition C.20 and 326 IAC 8-1-9(c).

D.3.13 Record keeping Requirements [326 IAC 8-1-10]

- (a) Pursuant to 326 IAC 8-1-10(c) (Compliance Certification, Record Keeping and Reporting Requirements for Certain Coating Facilities Using Compliant Coatings), upon changing the method of compliance for an existing coating facility from control devices (326 IAC 8-5-5(c)(3)(B)) to the use of compliant coatings (326 IAC 8-5-5(c)(1), (2), or (4)), the Permittee shall for each coating facility and for each coating used collect and record each day and maintain all of the following information:
- (1) The name and identification number of each coating, as applied;
 - (2) The mass of VOC (excluding water and exempt compounds) per volume of coating for each coating, as applied, or the VOC content of each coating, as applied, expressed in units necessary to determine compliance;
 - (3) As new compliant coatings are added to a coating facility, the records required by this condition shall be updated to include the new coating; and
 - (4) If use of a coating is discontinued, the records required by this section shall be maintained consistent with 326 IAC 8-1-9(c).
- (b) The records required in paragraph (a) of this condition shall be maintained in accordance with the requirements of Condition C.20 and 326 IAC 8-1-9(c).

D.3.14 Record Keeping Requirements [40 CFR 63.829] [326 IAC 20-18-1] [326 IAC 2-4.1]

- (a) Pursuant to the Printing and Publishing Industry NESHAP, the Permittee shall maintain records of all measurements needed to demonstrate compliance with Condition D.3.3 on a monthly basis. These records shall include at a minimum the following specified in 40 CFR 63.10(b)(2) (General Provisions) that are applicable:
- (1) All required measurements needed to demonstrate compliance with Condition D.3.3 (including, but not limited to, 15-minute averages of CMS data, raw performance testing measurements, raw performance evaluation measurements, control device and capture system operating parameter data, material usage, HAP usage, volatile matter usage, and solids usage that support data that the source is required to report); and
 - (2) All documentation supporting initial notifications of compliance status under 40 CFR 63.9 (General Provisions).
- (b) The records required in paragraph (a) of this condition shall be maintained in accordance with the following requirements of 40 CFR 63.10(b)(1) (General Provisions):
- (1) The Permittee shall maintain files of all information (including all reports and notifications) required by this rule recorded in a form suitable and readily available for expeditious inspection and review.
 - (2) The files shall be retained for at least five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent two years of data shall be retained on site. The

remaining three years of data may be retained off site.

- (3) Such files may be maintained on microfilm, on a computer, on computer floppy disks, on magnetic tape disks, or on microfiche.

D.3.15 Record Keeping Requirements

- (a) To document compliance with Condition D.3.4, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limit and/or the VOC emission limit established in Condition D.3.4.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;
 - (2) A log of the dates of use;
 - (3) The total VOC usage for each month at each press while operating the incinerators;
 - (4) The weight of VOCs emitted for each compliance period for each press; and
 - (5) The continuous temperature records for the catalytic and thermal incinerators and the temperature used to demonstrate compliance during the most recent compliance stack test.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.16 Reporting Requirements [326 IAC 8-1-10]

- (a) Pursuant to 326 IAC 8-5-5(c)(1), (2), or (4) and 326 IAC 8-1-10(d), the Permittee shall notify IDEM, OAQ in either of the following instances:
 - (1) Any record showing use of any noncompliant coatings shall be reported by submitting a copy of the record to IDEM, OAQ within thirty (30) days following use; such record shall also be submitted with the quarterly compliance monitoring report attached to this permit. The following information shall accompany each submittal:
 - (A) Name and location of the coating facility;
 - (B) Time, date, and duration of the noncompliance; and
 - (C) Corrective action taken.
 - (2) At least thirty (30) calendar days before changing the method of compliance from the use of compliant coatings (326 IAC 8-5-5(c)(1), (2), or (4)) to control devices (326 IAC 8-5-5(c)(3)(B)), the Permittee shall comply with all requirements of 326 IAC 8-1-12(b) of this rule, respectively. Upon changing the method of compliance for a coating facility from the use of compliant coatings to control devices, the Permittee shall comply with all requirements of 326 IAC 8-1-12.

- (b) Pursuant to 326 IAC 8-1-10(b), upon changing the method of compliance for an existing coating facility from control devices (326 IAC 8-5-5(c)(3)(B)) to the use of compliant coatings (326 IAC 8-5-5(c)(1), (2), or (4)), the Permittee shall certify to IDEM, OAQ that the coating facility is in compliance with the requirements of 326 IAC 8-1-10. The certification shall include the following:
- (1) The name and location of the source;
 - (2) The name, address, and telephone number of the person responsible for the source;
 - (3) Identification of each VOC emitting coating facility and identification of the applicable emission limitation;
 - (4) The name and identification number of each coating, as applied, used at each coating facility; and
 - (5) The mass of VOC (excluding water and exempt compounds) per volume of coating and the volume of each coating, as applied.

D.3.17 Reporting Requirements

- (a) A quarterly summary of the information to document compliance with Condition D.3.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. This quarterly summary report can be submitted in the same summary report required for Alternative Operating Scenarios 1, 2 and 4 through 10 in Conditions D.1.17(a), D.2.17(a), D.4.17(a), D.5.17(a), D.6.17(a), D.7.21(a), D.8.21(a), D.9.21(a), and D.10.21(a). The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) Pursuant to 326 IAC 2-7-5(9)(C), the Permittee shall include a summary of the records required under Condition D.3.12 in the annual compliance certification submitted under 326 IAC 2-7-6(5) and Condition B.11.

D.3.18 Reporting Requirements [40CFR 63.830] [326 IAC 20-18-1] [326 IAC 2-4.1]

Pursuant to the Printing and Publishing Industry NESHAP, the Permittee shall submit the reports and plans listed below to the following addresses:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (a) A Notification of Compliance Status specified in 40 CFR 63.9(h) (General Provisions). This

notification can be submitted in the same notification required for Alternative Operating Scenarios 1, 2, and 4 through 10 in Conditions D.1.18(a), D.2.18(a), D.4.18(a), D.5.18(a), D.6.18(a), D.7.22(b), D.8.22(b), D.9.22(b), and D.10.22(b).

- (b) A summary report specified in 40 CFR 63.10(e)(3) (General Provisions) shall be submitted on a semi-annual basis (i.e., once every six-month period). In addition to a report of operating parameter exceedances as required by 40 CFR 63.10(e)(3)(i) (General Provisions), the summary report shall include exceedances of the standards in Condition D.3.3. This summary report can be submitted in the same summary report required for Alternative Operating Scenarios 1, 2, and 4 through 10 in Conditions D.1.18(b), D.2.18(b), D.4.18(b), D.5.18(b), D.6.18(b), D.7.22(e), D.8.22(e), D.9.22(e), and D.10.22(e).

SECTION D.4 FACILITY OPERATION CONDITIONS
Alternative Operating Scenario 4 for Printing Stations Using Compliant (i.e., Water-based)
Materials

Facility Description [326 IAC 2-7-5(15)] - The following packaging rotogravure printing operations:

- (1) one (1) ten (10) station packaging rotogravure printing press identified as Press #1 (ten stations: P1U1 through P1U10), constructed in May of 1990, with a maximum line speed of 840 feet per minute (ft/min) when printing with ink and 740 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system with a total heat input rate of 7.76 million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) emissions from P1U1-P1U10 are controlled by one of the following:
 - (a) a single catalytic oxidizing incinerator identified as OXD#1 exhausting through one (1) stack (S/V ID: S-OXD1); or
 - (b) a single catalytic oxidizing incinerator identified as OXD#2 exhausting through one (1) stack (S/V ID: S-OXD2); or
 - (c) two (2) catalytic oxidizing incinerators configured in parallel, respectively identified as OXD#1 and OXD#2, with each incinerator exhausting through one (1) stack (S/V ID: S-OXD1 and S-OXD2), respectively.
- (2) one (1) nine (9) station packaging rotogravure printing press identified as Press #2 (nine stations: P2U1 through P2U9), constructed in April of 1991, with a maximum line speed of 840 feet per minute (ft/min) when printing with ink and 740 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system with a total heat input rate of 7.76 million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) emissions from P2U1-P2U9 are controlled by one of the following:
 - (a) a single catalytic oxidizing incinerator identified as OXD#2 exhausting through one (1) stack (S/V ID: S-OXD2); or
 - (b) a single catalytic oxidizing incinerator identified as OXD #5 exhausting through one (1) stack (S/V ID: S-OXD5); or
 - (c) two (2) catalytic oxidizing incinerators configured in parallel, respectively identified as OXD#2 and OXD#5, with each incinerator exhausting through one (1) stack (S/V ID: S-OXD2 and S-OXD5), respectively.
- (3) one (1) eight (8) station packaging rotogravure printing press identified as Press #3 (eight stations: P3U1 through P3U8), constructed in April of 1997, with a maximum line speed of 800 ft/min when printing with ink and 700 ft/min when printing with ink and adhesive. The volatile organic compound (VOC) emissions from P3U1-P3U8 are controlled by one catalytic oxidizing incinerator identified as OXD#5 exhausting through one (1) stack (S/V ID: S-OXD5).
- (4) one (1) eight (8) station packaging rotogravure printing press identified as Press #4 (eight stations: P4U1 through P4U8), constructed in January of 1997, with a maximum line speed of 800 feet per minute (ft/min) when printing with ink and 700 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system with a total heat input rate of twelve (12) million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) emissions from P4U1-P4U8 are controlled by one of the following:
 - (a) a single catalytic oxidizing incinerator identified as OXD#3 exhausting through one (1) stack (S/V ID: S-OXD3); or
 - (b) a single thermal oxidizing incinerator identified as OXD#4 exhausting through one (1) stack (S/V ID: S-OXD4); or

- (c) catalytic and thermal oxidizing incinerators configured in parallel, respectively identified as OXD#3 and OXD#4, with each incinerator exhausting through one (1) stack (S/V ID: S-OXD3 and S-OXD4), respectively.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Graphic Arts Operations [326 IAC 8-5-5]

Pursuant to 326 IAC 8-5-5 (Graphic Arts Operations), the Permittee may not cause, allow, or permit the operation of the facility unless the Permittee uses one of the following types of compliant coatings:

- (a) The volatile fraction of the ink, as it is applied to the substrate, contains twenty-five percent (25%) by volume or less of VOC, and seventy-five percent (75%) by volume or more of water; or
- (b) The ink as it is applied to the substrate, less water, contains sixty percent (60%) by volume or more nonvolatile material; or
- (c) The ink, as applied to the substrate, meets an emission limit of five-tenths (0.5) pounds of VOC per pound of solids in the ink.

D.4.2 General Provisions Relating to HAPs [326 IAC 20-1-1] [40 CFR Part 63, Subpart A] [326 IAC 2-4.1]

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section, as specified in Table 1 of 40 CFR 63, Subpart KK.

D.4.3 Printing and Publishing Industry NESHAP [326 IAC 20-18-1] [40 CFR Part 63, Subpart KK] [326 IAC 2-4.1]

This facility is subject to 40 CFR 63, Subpart KK, which is incorporated by reference as 326 IAC 20-18-1. A copy of this rule is attached. The Permittee shall comply with all applicable provisions of this rule on and after May 30, 1999.

- (a) The four (4) packaging rotogravure printing presses (P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U8) shall limit emissions to no more than four (4) percent of the mass of inks, coatings, varnishes, adhesives, primers, solvents, reducers, thinners, and other materials applied for the month.
- (b) Pursuant to 40 CFR 63.825(b)(4), to demonstrate compliance with this standard, the Permittee shall, for each press, demonstrate that the monthly average as-applied organic HAP content, H_L , of all materials applied is less than 0.04 kg HAP per kg of material applied, as determined by the following equation:

$$H_L = \frac{\sum_{i=1}^p M_i C_{hi} + \sum_{j=1}^q M_j C_{hj}}{\sum_{i=1}^p M_i + \sum_{j=1}^q M_j}$$

where the symbols of this equation are defined in 40 CFR 63.822(b).

D.4.4 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

The source-wide potential to emit VOC is limited to less than 250 tons per year to be a minor source under 326 IAC 2-2 (PSD) and 40 CFR 52.21. The total input VOC, including coatings, dilution solvents, and cleaning solvents, to Presses #1 through #4 (emission units P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U8) shall be limited to 3,458 tons per twelve (12) consecutive month period. VOC emissions from each press shall be controlled by a capture and incineration system that achieves a minimum overall VOC control efficiency of 94%. This usage limitation will then be equivalent to a VOC emission limitation of 207.5 tons per year.

The above emission limits including VOC limits from Alternative Operating Scenarios 1, 2, 3, and 5 through 10 and VOC emissions from natural gas combustion, solvent degreasing and the insignificant activities will limit source-wide VOC emissions to less than 250 tons per year.

D.4.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and the control devices.

D.4.6 Enforcement Action [Agreed Order A-3820]

The Permittee shall comply with Agreed Order #A-3820, effective November 30, 1998. The Agreed Order is effective for a period of four (4) years from the Effective Date of the Agreed Order.

Compliance Determination Requirements

D.4.7 Testing Requirements [40 CFR Part 63, Subpart KK] [326 IAC 20-18-1] [326 IAC 2-4.1]

Pursuant to the Printing and Publishing Industry NESHAP, the Permittee shall comply with the following requirements:

- (a) Pursuant to 40 CFR 63.827(b)(2), the Permittee shall determine the organic HAP weight fraction of each ink, coating, varnish, adhesive, primer, solvent, thinner, reducer, diluent, and other material applied by following the procedure in 40 CFR 63.827(c)(2) included below and shall use this value for the organic HAP content for all compliance purposes.
 - (1) The Permittee shall determine the volatile matter and solids weight-fraction of each ink, coating, varnish, adhesive, primer, solvent, reducer, thinner, diluent, and other material applied using Method 24 of 40 CFR part 60, appendix A. The Method 24 determination may be performed by the manufacturer of the material and the results provided to the Permittee.
 - (2) If these values cannot be determined using Method 24, the Permittee shall submit an alternative technique for determining their values for approval by the

Administrator.

- (3) The Permittee may rely on formulation data, subject to the following, in accordance with the provisions of 40 CFR 63.827(c)(3):
 - (A) The Permittee may determine the volatile matter content of materials based on formulation data, and may rely on volatile matter content data provided by material suppliers; and
 - (B) In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR part 60, appendix A, the applicable test method shall govern, unless after consultation, the Permittee can demonstrate to the satisfaction of the enforcement agency that the formulation data are correct.
- (b) Pursuant to 40 CFR 63.825(g), the Permittee shall determine the mass of organic HAP emitted using the following procedure:
 - (1) Determine the sum of the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on intermittently-controllable work stations in bypass mode and the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on never-controlled work stations during the month, M_{Bi} .
 - (2) Determine the sum of the mass of all solvents, reducers, thinners, and other diluents which are applied on intermittently-controllable work stations in bypass mode and the mass of all solvents, reducers, thinners, and other diluents which are applied on never-controlled work stations during the month, M_{Bj} .
 - (3) Determine the sum of the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on intermittently-controllable work stations in controlled mode and the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on always-controlled work stations during the month, M_{Ci} .
 - (4) Determine the sum of the mass of all solvents, reducers, thinners, and other diluents which are applied on intermittently-controllable work stations in controlled mode and the mass of all solvents, reducers, thinners, and other diluents which are applied on always-controlled work stations during the month, M_{Cj} .
 - (5) Calculate the organic HAP emitted during the month using the following equation:

$$H = \left[\sum_{i=1}^p M_{Ci} C_{hi} + \sum_{j=1}^q M_{Cj} C_{hj} \right] * \left[1 - \left(\frac{E}{100} * \frac{F}{100} \right) \right] + \left[\sum_{i=1}^p M_{Bi} C_{hi} + \sum_{j=1}^q M_{Bj} C_{hj} \right]$$

where the symbols of this equation are defined in 40 CFR 63.822 (Definitions).

D.4.8 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.4.1 and D.4.4 shall be determined pursuant to 326 IAC 8-1-2(a) and 326 IAC 8-1-4(a)(3) using formulation data supplied by the coating manufacturer.

D.4.9 VOC Emissions

Compliance with Condition D.4.4 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the twelve (12) month period.

D.4.10 Volatile Organic Compounds (VOC) Control

- (a) The catalytic and thermal oxidizers controlling VOC emissions from Presses #1 through #4 (emission units P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U8) shall be in operation at all times that these units are in operation to ensure compliance with condition D.4.4.
- (b) The catalytic oxidizing incinerator identified as OXD#1 shall maintain a minimum operating temperature of 650°F during operation or a temperature that has been determined from the most recent compliant stack tests to maintain compliance with condition D.4.4.
- (c) The catalytic oxidizing incinerators identified as OXD#2, and OXD#3 shall each maintain a minimum operating temperature of 600°F during operation or a temperature that has been determined from the most recent compliant stack tests to maintain compliance with condition D.4.4.
- (d) The thermal oxidizing incinerator identified as OXD #4 shall maintain a minimum operating temperature of 1,500°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain compliance with condition D.4.4.
- (e) The catalytic oxidizing incinerator identified as OXD #5 shall maintain a minimum operating temperature of 600°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain compliance with condition D.4.4.

Note: The use of the oxidizers to control VOC emissions from Presses #1 through #4 to comply with the PSD minor VOC emission limitation was voluntarily proposed by the source. Therefore, the source may apply for a modification to remove the requirement to operate the oxidizers at all times that any of the presses are in operation under this Alternative Operating Scenario at any time if compliance with the PSD minor VOC emission limit can be achieved by other means.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.4.11 Parametric Monitoring

A continuous monitoring system shall be calibrated, maintained, and operated on each of the oxidizers for measuring operating temperature. The output of these systems shall be recorded, and the temperature for each oxidizer shall be greater than or equal to the temperature used to demonstrate compliance during the most recent compliance stack test.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.4.12 Contemporaneous Log for Alternate Operating Scenarios [326 IAC 2-7-5(9)]

- (a) Pursuant to 326 IAC 2-7-5(9)(A), contemporaneously with making a change from one alternative operating scenario to another, the Permittee shall make a record in a log at the permitted facility of the scenario under which it is operating. The record should state the alternative operating scenario for each station, since different stations at the same press may be operating under different scenarios.
- (b) The records required in paragraph (a) of this condition shall be maintained in accordance with the requirements of Condition C.20 and 326 IAC 8-1-9(c).

D.4.13 Record keeping Requirements [326 IAC 8-1-10]

- (a) Pursuant to 326 IAC 8-1-10(c) (Compliance Certification, Record Keeping and Reporting Requirements for Certain Coating Facilities Using Compliant Coatings), upon changing the method of compliance for an existing coating facility from control devices (326 IAC 8-5-5(c)(3)(B)) to the use of compliant coatings (326 IAC 8-5-5(c)(1), (2), or (4)), the Permittee shall for each coating facility and for each coating used collect and record each day and maintain all of the following information:
 - (1) The name and identification number of each coating, as applied;
 - (2) The mass of VOC (excluding water and exempt compounds) per volume of coating for each coating, as applied, or the VOC content of each coating, as applied, expressed in units necessary to determine compliance;
 - (3) As new compliant coatings are added to a coating facility, the records required by this condition shall be updated to include the new coating; and
 - (4) If use of a coating is discontinued, the records required by this section shall be maintained consistent with 326 IAC 8-1-9(c).
- (b) The records required in paragraph (a) of this condition shall be maintained in accordance with the requirements of Condition C.20 and 326 IAC 8-1-9(c).

D.4.14 Record Keeping Requirements [40 CFR 63.829] [326 IAC 20-18-1] [326 IAC 2-4.1]

- (a) Pursuant to the Printing and Publishing Industry NESHAP, the Permittee shall maintain records of all measurements needed to demonstrate compliance with Condition D.4.3 on a monthly basis. These records shall include at a minimum the following specified in 40 CFR 63.10(b)(2) (General Provisions) that are applicable:
 - (1) All required measurements needed to demonstrate compliance with Condition D.4.3 (including, but not limited to, 15-minute averages of CMS data, raw performance testing measurements, raw performance evaluation measurements, control device and capture system operating parameter data, material usage, HAP usage, volatile matter usage, and solids usage that support data that the source is required to report); and
 - (2) All documentation supporting initial notifications of compliance status under 40 CFR 63.9 (General Provisions).
- (b) The records required in paragraph (a) of this condition shall be maintained in accordance with the following requirements of 40 CFR 63.10(b)(1) (General Provisions):

- (1) The Permittee shall maintain files of all information (including all reports and notifications) required by this rule recorded in a form suitable and readily available for expeditious inspection and review.
- (2) The files shall be retained for at least five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent two years of data shall be retained on site. The remaining three years of data may be retained off site.
- (3) Such files may be maintained on microfilm, on a computer, on computer floppy disks, on magnetic tape disks, or on microfiche.

D.4.15 Record Keeping Requirements

- (a) To document compliance with Condition D.4.4, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limit and/or the VOC emission limit established in Condition D.4.4.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;
 - (2) A log of the dates of use;
 - (3) The total VOC usage for each month at each press while operating the incinerators;
 - (4) The weight of VOCs emitted for each compliance period for each press; and
 - (5) The continuous temperature records for the catalytic and thermal incinerators and the temperature used to demonstrate compliance during the most recent compliance stack test.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.4.16 Reporting Requirements [326 IAC 8-1-10]

- (a) Pursuant to 326 IAC 8-5-5(c)(1), (2), or (4) and 326 IAC 8-1-10(d), the Permittee shall notify IDEM, OAQ in either of the following instances:
 - (1) Any record showing use of any noncompliant coatings shall be reported by submitting a copy of the record to IDEM, OAQ within thirty (30) days following use; such record shall also be submitted with the quarterly compliance monitoring report attached to this permit. The following information shall accompany each submittal:
 - (A) Name and location of the coating facility;
 - (B) Time, date, and duration of the noncompliance; and
 - (C) Corrective action taken.

- (2) At least thirty (30) calendar days before changing the method of compliance from the use of compliant coatings (326 IAC 8-5-5(c)(1), (2), or (4)) to control devices (326 IAC 8-5-5(c)(3)(B)), the Permittee shall comply with all requirements of 326 IAC 8-1-12(b) of this rule, respectively. Upon changing the method of compliance for a coating facility from the use of compliant coatings to control devices, the Permittee shall comply with all requirements of 326 IAC 8-1-12.
- (b) Pursuant to 326 IAC 8-1-10(b), upon changing the method of compliance for an existing coating facility from control devices (326 IAC 8-5-5(c)(3)(B)) to the use of compliant coatings (326 IAC 8-5-5(c)(1), (2), or (4)), the Permittee shall certify to IDEM, OAQ that the coating facility is in compliance with the requirements of 326 IAC 8-1-10. The certification shall include the following:
 - (1) The name and location of the source;
 - (2) The name, address, and telephone number of the person responsible for the source;
 - (3) Identification of each VOC emitting coating facility and identification of the applicable emission limitation;
 - (4) The name and identification number of each coating, as applied, used at each coating facility; and
 - (5) The mass of VOC (excluding water and exempt compounds) per volume of coating and the volume of each coating, as applied.

D.4.17 Reporting Requirements

- (a) A quarterly summary of the information to document compliance with Condition D.4.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. This quarterly summary report can be submitted in the same summary report required for Alternative Operating Scenarios 1, 2, 3, and 5 through 10 in Conditions D.1.17(a), D.2.17(a), D.3.17(a), D.5.17(a), D.6.17(a), D.7.21(a), D.8.21(a), D.9.21(a), and D.10.21(a). The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) Pursuant to 326 IAC 2-7-5(9)(C), the Permittee shall include a summary of the records required under Condition D.4.12 in the annual compliance certification submitted under 326 IAC 2-7-6(5) and Condition B.11.

D.4.18 Reporting Requirements [40CFR 63.830] [326 IAC 20-18-1] [326 IAC 2-4.1]

Pursuant to the Printing and Publishing Industry NESHAP, the Permittee shall submit the reports and plans listed below to the following addresses:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (a) A Notification of Compliance Status specified in 40 CFR 63.9(h) (General Provisions). This notification can be submitted in the same notification required for Alternative Operating Scenarios 1, 2, 3, and 5 through 10 in Conditions D.1.18(a), D.2.18(a), D.3.18(a), D.5.18(a), D.6.18(a), D.7.22(b), D.8.22(b), D.9.22(b), and D.10.22(b).
- (b) A summary report specified in 40 CFR 63.10(e)(3) (General Provisions) shall be submitted on a semi-annual basis (i.e., once every six-month period). In addition to a report of operating parameter exceedances as required by 40 CFR 63.10(e)(3)(i) (General Provisions), the summary report shall include exceedances of the standards in Condition D.4.3. This summary report can be submitted in the same summary report required for Alternative Operating Scenarios 1, 2, 3, and 5 through 10 in Conditions D.1.18(b), D.2.18(b), D.3.18(b), D.5.18(b), D.6.18(b), D.7.22(e), D.8.22(e), D.9.22(e), and D.10.22(e).

- (1) one (1) ten (10) station packaging rotogravure printing press identified as Press #1 (ten stations: P1U1 through P1U10), constructed in May of 1990, with a maximum line speed of 840 feet per minute (ft/min) when printing with ink and 740 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system with a total heat input rate of 7.76 million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) emissions from P1U1-P1U10 are controlled by one of the following:
 - (a) a single catalytic oxidizing incinerator identified as OXD#1 exhausting through one (1) stack (S/V ID: S-OXD1); or
 - (b) a single catalytic oxidizing incinerator identified as OXD#2 exhausting through one (1) stack (S/V ID: S-OXD2); or
 - (c) two (2) catalytic oxidizing incinerators configured in parallel, respectively identified as OXD#1 and OXD#2, with each incinerator exhausting through one (1) stack (S/V ID: S-OXD1 and S-OXD2), respectively.
- (2) one (1) nine (9) station packaging rotogravure printing press identified as Press #2 (nine stations: P2U1 through P2U9), constructed in April of 1991, with a maximum line speed of 840 feet per minute (ft/min) when printing with ink and 740 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system with a total heat input rate of 7.76 million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) emissions from P2U1-P2U9 are controlled by one of the following:
 - (a) a single catalytic oxidizing incinerator identified as OXD#2 exhausting through one (1) stack (S/V ID: S-OXD2); or
 - (b) a single catalytic oxidizing incinerator identified as OXD #5 exhausting through one (1) stack (S/V ID: S-OXD5); or
 - (c) two (2) catalytic oxidizing incinerators configured in parallel, respectively identified as OXD#2 and OXD#5, with each incinerator exhausting through one (1) stack (S/V ID: S-OXD2 and S-OXD5), respectively.
- (3) one (1) eight (8) station packaging rotogravure printing press identified as Press #3 (eight stations: P3U1 through P3U8), constructed in April of 1997, with a maximum line speed of 800 ft/min when printing with ink and 700 ft/min when printing with ink and adhesive. The volatile organic compound (VOC) emissions from P3U1-P3U8 are controlled by one catalytic oxidizing incinerator identified as OXD#5 exhausting through one (1) stack (S/V ID: S-OXD5).
- (4) one (1) eight (8) station packaging rotogravure printing press identified as Press #4 (eight stations: P4U1 through P4U8), constructed in January of 1997, with a maximum line speed of 800 feet per minute (ft/min) when printing with ink and 700 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system with a total heat input rate of twelve (12) million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) emissions from P4U1-P4U8 are controlled by one of the following:
 - (a) a single catalytic oxidizing incinerator identified as OXD#3 exhausting through one (1) stack (S/V ID: S-OXD3); or
 - (b) a single thermal oxidizing incinerator identified as OXD#4 exhausting through one (1) stack (S/V ID: S-OXD4); or

(c) catalytic and thermal oxidizing incinerators configured in parallel, respectively identified as OXD#3 and OXD#4, with each incinerator exhausting through one (1) stack (S/V ID: S-OXD3 and S-OXD4), respectively.
 (The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.5.1 Graphic Arts Operations [326 IAC 8-5-5]

Pursuant to 326 IAC 8-5-5 (Graphic Arts Operations), the Permittee may not cause, allow, or permit the operation of the facility unless the Permittee uses one of the following types of compliant coatings:

- (a) The volatile fraction of the ink, as it is applied to the substrate, contains twenty-five percent (25%) by volume or less of VOC, and seventy-five percent (75%) by volume or more of water; or
- (b) The ink as it is applied to the substrate, less water, contains sixty percent (60%) by volume or more nonvolatile material; or
- (c) The ink, as applied to the substrate, meets an emission limit of five-tenths (0.5) pounds of VOC per pound of solids in the ink.

D.5.2 General Provisions Relating to HAPs [326 IAC 20-1-1] [40 CFR Part 63, Subpart A] [326 IAC 2-4.1]

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section, as specified in Table 1 of 40 CFR 63, Subpart KK.

D.5.3 Printing and Publishing Industry NESHAP [326 IAC 20-18-1] [40 CFR Part 63, Subpart KK] [326 IAC 2-4.1]

This facility is subject to 40 CFR 63, Subpart KK, which is incorporated by reference as 326 IAC 20-18-1. A copy of this rule is attached. The Permittee shall comply with all applicable provisions of this rule on and after May 30, 1999.

- (a) The four (4) packaging rotogravure printing presses (P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U8) shall limit emissions to no more than twenty (20) percent of the mass of solids applied for the month.
- (b) Pursuant to 40 CFR 63.825(b)(5), to demonstrate compliance with this standard, the Permittee shall, for each press, demonstrate that the monthly average as-applied organic HAP content on the basis of solids applied, H_s , is less than 0.20 kg HAP per kg of solids applied, as determined by the following equation:

$$H_s = \frac{\sum_{i=1}^p M_i C_{hi} + \sum_{j=1}^q M_j C_{hj}}{\sum_{i=1}^p M_i C_{si}}$$

where the symbols of this equation are defined in 40 CFR 63.822(b).

D.5.4 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

The source-wide potential to emit VOC is limited to less than 250 tons per year to be a minor source under 326 IAC 2-2 (PSD) and 40 CFR 52.21. The total input VOC, including coatings, dilution solvents, and cleaning solvents, to Presses #1 through #4 (emission units P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U8) shall be limited to 3,458 tons per twelve (12) consecutive month period. VOC emissions from each press shall be controlled by a capture and incineration system that achieves a minimum overall VOC control efficiency of 94%. This usage limitation will then be equivalent to a VOC emission limitation of 207.5 tons per year.

The above emission limits including VOC limits from Alternative Operating Scenarios 1 through 4 and 6 through 10 and VOC emissions from natural gas combustion, solvent degreasing and the insignificant activities will limit source-wide VOC emissions to less than 250 tons per year.

D.5.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and the control devices.

D.5.6 Enforcement Action [Agreed Order A-3820]

The Permittee shall comply with Agreed Order #A-3820, effective November 30, 1998. The Agreed Order is effective for a period of four (4) years from the Effective Date of the Agreed Order.

Compliance Determination Requirements

D.5.7 Testing Requirements [40 CFR Part 63, Subpart KK] [326 IAC 20-18-1] [326 IAC 2-4.1]

Pursuant to the Printing and Publishing Industry NESHAP, the Permittee shall comply with the following requirements:

- (a) Pursuant to 40 CFR 63.827(b)(2), the Permittee shall determine the organic HAP weight fraction of each ink, coating, varnish, adhesive, primer, solvent, thinner, reducer, diluent, and other material applied by following the procedure in 40 CFR 63.827(c)(2) included below and shall use this value for the organic HAP content for all compliance purposes.
 - (1) The Permittee shall determine the volatile matter and solids weight-fraction of each ink, coating, varnish, adhesive, primer, solvent, reducer, thinner, diluent, and other material applied using Method 24 of 40 CFR part 60, appendix A. The Method 24 determination may be performed by the manufacturer of the material and the results provided to the Permittee.
 - (2) If these values cannot be determined using Method 24, the Permittee shall submit an alternative technique for determining their values for approval by the Administrator.
 - (3) The Permittee may rely on formulation data, subject to the following, in accordance with the provisions of 40 CFR 63.827(c)(3):
 - (A) The Permittee may determine the volatile matter content of materials based on formulation data, and may rely on volatile matter content data provided by material suppliers; and

- (B) In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR part 60, appendix A, the applicable test method shall govern, unless after consultation, the Permittee can demonstrate to the satisfaction of the enforcement agency that the formulation data are correct.
- (b) Pursuant to 40 CFR 63.825(g), the Permittee shall determine the mass of organic HAP emitted using the following procedure:
- (1) Determine the sum of the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on intermittently-controllable work stations in bypass mode and the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on never-controlled work stations during the month, M_{Bi} .
 - (2) Determine the sum of the mass of all solvents, reducers, thinners, and other diluents which are applied on intermittently-controllable work stations in bypass mode and the mass of all solvents, reducers, thinners, and other diluents which are applied on never-controlled work stations during the month, M_{Bj} .
 - (3) Determine the sum of the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on intermittently-controllable work stations in controlled mode and the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on always-controlled work stations during the month, M_{Ci} .
 - (4) Determine the sum of the mass of all solvents, reducers, thinners, and other diluents which are applied on intermittently-controllable work stations in controlled mode and the mass of all solvents, reducers, thinners, and other diluents which are applied on always-controlled work stations during the month, M_{Cj} .
 - (5) Calculate the organic HAP emitted during the month using the following equation:

$$H = \left[\sum_{i=1}^p M_{Ci} C_{hi} + \sum_{j=1}^q M_{Cj} C_{hj} \right] * \left[1 - \left(\frac{E}{100} * \frac{F}{100} \right) \right] + \left[\sum_{i=1}^p M_{Bi} C_{hi} + \sum_{j=1}^q M_{Bj} C_{hj} \right]$$

where the symbols of this equation are defined in 40 CFR 63.822 (Definitions).

D.5.8 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.5.1 and D.5.4 shall be determined pursuant to 326 IAC 8-1-2(a) and 326 IAC 8-1-4(a)(3) using formulation data supplied by the coating manufacturer.

D.5.9 VOC Emissions

Compliance with Condition D.5.4 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the twelve (12) month period.

D.5.10 Volatile Organic Compounds (VOC) Control

- (a) The catalytic and thermal oxidizers controlling VOC emissions from Presses #1 through #4 (emission units P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U8) shall be in operation at all times that these units are in operation to ensure compliance with condition D.5.4.
- (b) The catalytic oxidizing incinerator identified as OXD#1 shall maintain a minimum operating temperature of 650°F during operation or a temperature that has been determined from the most recent compliant stack tests to maintain compliance with condition D.5.4.
- (c) The catalytic oxidizing incinerators identified as OXD#2, and OXD#3 shall each maintain a minimum operating temperature of 600°F during operation or a temperature that has been determined from the most recent compliant stack tests to maintain compliance with condition D.5.4.
- (d) The thermal oxidizing incinerator identified as OXD #4 shall maintain a minimum operating temperature of 1,500°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain compliance with condition D.5.4.
- (e) The catalytic oxidizing incinerator identified as OXD #5 shall maintain a minimum operating temperature of 600°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain compliance with condition D.5.4.

Note: The use of the oxidizers to control VOC emissions from Presses #1 through #4 to comply with the PSD minor VOC emission limitation was voluntarily proposed by the source. Therefore, the source may apply for a modification to remove the requirement to operate the oxidizers at all times that any of the presses are in operation under this Alternative Operating Scenario at any time if compliance with the PSD minor VOC emission limit can be achieved by other means.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.5.11 Parametric Monitoring

A continuous monitoring system shall be calibrated, maintained, and operated on each of the oxidizers for measuring operating temperature. The output of these systems shall be recorded, and the temperature for each oxidizer shall be greater than or equal to the temperature used to demonstrate compliance during the most recent compliance stack test.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.5.12 Contemporaneous Log for Alternate Operating Scenarios [326 IAC 2-7-5(9)]

- (a) Pursuant to 326 IAC 2-7-5(9)(A), contemporaneously with making a change from one alternative operating scenario to another, the Permittee shall make a record in a log at the permitted facility of the scenario under which it is operating. The record should state the alternative operating scenario for each station, since different stations at the same press may be operating under different scenarios.
- (b) The records required in paragraph (a) of this condition shall be maintained in accordance with the requirements of Condition C.20 and 326 IAC 8-1-9(c).

D.5.13 Record keeping Requirements [326 IAC 8-1-10]

-
- (a) Pursuant to 326 IAC 8-1-10(c) (Compliance Certification, Record Keeping and Reporting Requirements for Certain Coating Facilities Using Compliant Coatings), upon changing the method of compliance for an existing coating facility from control devices (326 IAC 8-5-5(c)(3)(B)) to the use of compliant coatings (326 IAC 8-5-5(c)(1), (2), or (4)), the Permittee shall for each coating facility and for each coating used collect and record each day and maintain all of the following information:
- (1) The name and identification number of each coating, as applied;
 - (2) The mass of VOC (excluding water and exempt compounds) per volume of coating for each coating, as applied, or the VOC content of each coating, as applied, expressed in units necessary to determine compliance;
 - (3) As new compliant coatings are added to a coating facility, the records required by this condition shall be updated to include the new coating; and
 - (4) If use of a coating is discontinued, the records required by this section shall be maintained consistent with 326 IAC 8-1-9(c).
- (b) The records required in paragraph (a) of this condition shall be maintained in accordance with the requirements of Condition C.20 and 326 IAC 8-1-9(c).

D.5.14 Record Keeping Requirements [40 CFR 63.829] [326 IAC 20-18-1] [326 IAC 2-4.1]

- (a) Pursuant to the Printing and Publishing Industry NESHAP, the Permittee shall maintain records of all measurements needed to demonstrate compliance with Condition D.5.3 on a monthly basis. These records shall include at a minimum the following specified in 40 CFR 63.10(b)(2) (General Provisions) that are applicable:
- (1) All required measurements needed to demonstrate compliance with Condition D.5.3 (including, but not limited to, 15-minute averages of CMS data, raw performance testing measurements, raw performance evaluation measurements, control device and capture system operating parameter data, material usage, HAP usage, volatile matter usage, and solids usage that support data that the source is required to report); and
 - (2) All documentation supporting initial notifications of compliance status under 40 CFR 63.9 (General Provisions).
- (b) The records required in paragraph (a) of this condition shall be maintained in accordance with the following requirements of 40 CFR 63.10(b)(1) (General Provisions):
- (1) The Permittee shall maintain files of all information (including all reports and notifications) required by this rule recorded in a form suitable and readily available for expeditious inspection and review.
 - (2) The files shall be retained for at least five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent two years of data shall be retained on site. The remaining three years of data may be retained off site.
 - (3) Such files may be maintained on microfilm, on a computer, on computer floppy disks, on magnetic tape disks, or on microfiche.

D.5.15 Record Keeping Requirements

- (a) To document compliance with Condition D.5.4, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limit and/or the VOC emission limit established in Condition D.5.4.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;
 - (2) A log of the dates of use;
 - (3) The total VOC usage for each month at each press while operating the incinerators;
 - (4) The weight of VOCs emitted for each compliance period for each press; and
 - (5) The continuous temperature records for the catalytic and thermal incinerators and the temperature used to demonstrate compliance during the most recent compliance stack test.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.5.16 Reporting Requirements [326 IAC 8-1-10]

- (a) Pursuant to 326 IAC 8-5-5(c)(1), (2), or (4) and 326 IAC 8-1-10(d), the Permittee shall notify IDEM, OAQ in either of the following instances:
 - (1) Any record showing use of any noncompliant coatings shall be reported by submitting a copy of the record to IDEM, OAQ within thirty (30) days following use; such record shall also be submitted with the quarterly compliance monitoring report attached to this permit. The following information shall accompany each submittal:
 - (A) Name and location of the coating facility;
 - (B) Time, date, and duration of the noncompliance; and
 - (C) Corrective action taken.
 - (2) At least thirty (30) calendar days before changing the method of compliance from the use of compliant coatings (326 IAC 8-5-5(c)(1), (2), or (4)) to control devices (326 IAC 8-5-5(c)(3)(B)), the Permittee shall comply with all requirements of 326 IAC 8-1-12(b) of this rule, respectively. Upon changing the method of compliance for a coating facility from the use of compliant coatings to control devices, the Permittee shall comply with all requirements of 326 IAC 8-1-12.
- (b) Pursuant to 326 IAC 8-1-10(b), upon changing the method of compliance for an existing coating facility from control devices (326 IAC 8-5-5(c)(3)(B)) to the use of compliant coatings (326 IAC 8-5-5(c)(1), (2), or (4)), the Permittee shall certify to IDEM, OAQ that the coating facility is in compliance with the requirements of 326 IAC 8-1-10. The certification

shall include the following:

- (1) The name and location of the source;
- (2) The name, address, and telephone number of the person responsible for the source;
- (3) Identification of each VOC emitting coating facility and identification of the applicable emission limitation;
- (4) The name and identification number of each coating, as applied, used at each coating facility; and
- (5) The mass of VOC (excluding water and exempt compounds) per volume of coating and the volume of each coating, as applied.

D.5.17 Reporting Requirements

- (a) A quarterly summary of the information to document compliance with Condition D.5.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. This quarterly summary report can be submitted in the same summary report required for Alternative Operating Scenarios 1 through 4 and 6 through 10 in Conditions D.1.17(a), D.2.17(a), D.3.17(a), D.4.17(a), D.6.17(a), D.7.21(a), D.8.21(a), D.9.21(a), and D.10.21(a). The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) Pursuant to 326 IAC 2-7-5(9)(C), the Permittee shall include a summary of the records required under Condition D.5.12 in the annual compliance certification submitted under 326 IAC 2-7-6(5) and Condition B.11.

D.5.18 Reporting Requirements [40CFR 63.830] [326 IAC 20-18-1] [326 IAC 2-4.1]

Pursuant to the Printing and Publishing Industry NESHAP, the Permittee shall submit the reports and plans listed below to the following addresses:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (a) A Notification of Compliance Status specified in 40 CFR 63.9(h) (General Provisions). This notification can be submitted in the same notification required for Alternative Operating Scenarios 1 through 4 and 6 through 10 in Conditions D.1.18(a), D.2.18(a), D.3.18(a), D.4.18(a), D.6.18(a), D.7.22(b), D.8.22(b), D.9.22(b), and D.10.22(b).

- (b) A summary report specified in 40 CFR 63.10(e)(3) (General Provisions) shall be submitted on a semi-annual basis (i.e., once every six-month period). In addition to a report of operating parameter exceedances as required by 40 CFR 63.10(e)(3)(i) (General Provisions), the summary report shall include exceedances of the standards in Condition D.5.3. This summary report can be submitted in the same summary report required for Alternative Operating Scenarios 1 through 4 and 6 through 10 in Conditions D.1.18(b), D.2.18(b), D.3.18(b), D.4.18(b), D.6.18(b), D.7.22(e), D.8.22(e), D.9.22(e), and D.10.22(e).

SECTION D.6 **FACILITY OPERATION CONDITIONS**
Alternative Operating Scenario 6 for Printing Stations Using Compliant (i.e., Water-based)
Materials

Facility Description [326 IAC 2-7-5(15)] - The following packaging rotogravure printing operations:

- (1) one (1) ten (10) station packaging rotogravure printing press identified as Press #1 (ten stations: P1U1 through P1U10), constructed in May of 1990, with a maximum line speed of 840 feet per minute (ft/min) when printing with ink and 740 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system with a total heat input rate of 7.76 million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) emissions from P1U1-P1U10 are controlled by one of the following:
 - (a) a single catalytic oxidizing incinerator identified as OXD#1 exhausting through one (1) stack (S/V ID: S-OXD1); or
 - (b) a single catalytic oxidizing incinerator identified as OXD#2 exhausting through one (1) stack (S/V ID: S-OXD2); or
 - (c) two (2) catalytic oxidizing incinerators configured in parallel, respectively identified as OXD#1 and OXD#2, with each incinerator exhausting through one (1) stack (S/V ID: S-OXD1 and S-OXD2), respectively.
- (2) one (1) nine (9) station packaging rotogravure printing press identified as Press #2 (nine stations: P2U1 through P2U9), constructed in April of 1991, with a maximum line speed of 840 feet per minute (ft/min) when printing with ink and 740 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system with a total heat input rate of 7.76 million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) emissions from P2U1-P2U9 are controlled by one of the following:
 - (a) a single catalytic oxidizing incinerator identified as OXD#2 exhausting through one (1) stack (S/V ID: S-OXD2); or
 - (b) a single catalytic oxidizing incinerator identified as OXD #5 exhausting through one (1) stack (S/V ID: S-OXD5); or
 - (c) two (2) catalytic oxidizing incinerators configured in parallel, respectively identified as OXD#2 and OXD#5, with each incinerator exhausting through one (1) stack (S/V ID: S-OXD2 and S-OXD5), respectively.
- (3) one (1) eight (8) station packaging rotogravure printing press identified as Press #3 (eight stations: P3U1 through P3U8), constructed in April of 1997, with a maximum line speed of 800 ft/min when printing with ink and 700 ft/min when printing with ink and adhesive. The volatile organic compound (VOC) emissions from P3U1-P3U8 are controlled by one catalytic oxidizing incinerator identified as OXD#5 exhausting through one (1) stack (S/V ID: S-OXD5).
- (4) one (1) eight (8) station packaging rotogravure printing press identified as Press #4 (eight stations: P4U1 through P4U8), constructed in January of 1997, with a maximum line speed of 800 feet per minute (ft/min) when printing with ink and 700 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system with a total heat input rate of twelve (12) million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) emissions from P4U1-P4U8 are controlled by one of the following:
 - (a) a single catalytic oxidizing incinerator identified as OXD#3 exhausting through one (1) stack (S/V ID: S-OXD3); or
 - (b) a single thermal oxidizing incinerator identified as OXD#4 exhausting through one (1) stack (S/V ID: S-OXD4); or

(c) catalytic and thermal oxidizing incinerators configured in parallel, respectively identified as OXD#3 and OXD#4, with each incinerator exhausting through one (1) stack (S/V ID: S-OXD3 and S-OXD4), respectively.
 (The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.6.1 Graphic Arts Operations [326 IAC 8-5-5]

Pursuant to 326 IAC 8-5-5 (Graphic Arts Operations), the Permittee may not cause, allow, or permit the operation of the facility unless the Permittee uses one of the following types of compliant coatings:

- (a) The volatile fraction of the ink, as it is applied to the substrate, contains twenty-five percent (25%) by volume or less of VOC, and seventy-five percent (75%) by volume or more of water; or
- (b) The ink as it is applied to the substrate, less water, contains sixty percent (60%) by volume or more nonvolatile material; or
- (c) The ink, as applied to the substrate, meets an emission limit of five-tenths (0.5) pounds of VOC per pound of solids in the ink.

D.6.2 General Provisions Relating to HAPs [326 IAC 20-1-1] [40 CFR Part 63, Subpart A] [326 IAC 2-4.1]

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section, as specified in Table 1 of 40 CFR 63, Subpart KK.

D.6.3 Printing and Publishing Industry NESHAP [326 IAC 20-18-1] [40 CFR Part 63, Subpart KK] [326 IAC 2-4.1]

This facility is subject to 40 CFR 63, Subpart KK, which is incorporated by reference as 326 IAC 20-18-1. A copy of this rule is attached. The Permittee shall comply with all applicable provisions of this rule on and after May 30, 1999.

- (a) The four (4) packaging rotogravure printing presses (P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U8) shall limit emissions to a calculated equivalent allowable mass based on the organic HAP and solids contents of the inks, coatings, varnishes, adhesives, primers, solvents, reducers, thinners, and other materials applied for the month.
- (b) Pursuant to 40 CFR 63.825(b)(6), to demonstrate compliance with this standard, the Permittee shall, for each press, demonstrate that the total monthly organic HAP applied, H , as determined by the following equation, is less than the calculated equivalent allowable organic HAP, H_a , as determined by 40 CFR 63.825(e) and Condition D.6.7(b):

$$H = \sum_{i=1}^p M_i C_{hi} + \sum_{j=1}^q M_j C_{hj}$$

where the symbols of this equation are defined in 40 CFR 63.822(b).

D.6.4 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

The source-wide potential to emit VOC is limited to less than 250 tons per year to be a minor source under 326 IAC 2-2 (PSD) and 40 CFR 52.21. The total input VOC, including coatings, dilution solvents, and cleaning solvents, to Presses #1 through #4 (emission units P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U8) shall be limited to 3,458 tons per twelve (12) consecutive month period. VOC emissions from each press shall be controlled by a capture and incineration system that achieves a minimum overall VOC control efficiency of 94%. This usage limitation will then be equivalent to a VOC emission limitation of 207.5 tons per year.

The above emission limits including VOC limits from Alternative Operating Scenarios 1 through 5 and 7 through 10 and VOC emissions from natural gas combustion, solvent degreasing and the insignificant activities will limit source-wide VOC emissions to less than 250 tons per year.

D.6.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and the control devices.

D.6.6 Enforcement Action [Agreed Order A-3820]

The Permittee shall comply with Agreed Order #A-3820, effective November 30, 1998. The Agreed Order is effective for a period of four (4) years from the Effective Date of the Agreed Order.

Compliance Determination Requirements

D.6.7 Testing Requirements [40 CFR Part 63, Subpart KK] [326 IAC 20-18-1] [326 IAC 2-4.1]

Pursuant to the Printing and Publishing Industry NESHAP, the Permittee shall comply with the following requirements:

- (a) Pursuant to 40 CFR 63.827(b)(2), the Permittee shall determine the organic HAP weight fraction of each ink, coating, varnish, adhesive, primer, solvent, thinner, reducer, diluent, and other material applied by following the procedure in 40 CFR 63.827(c)(2) included below and shall use this value for the organic HAP content for all compliance purposes.
 - (1) The Permittee shall determine the volatile matter and solids weight-fraction of each ink, coating, varnish, adhesive, primer, solvent, reducer, thinner, diluent, and other material applied using Method 24 of 40 CFR part 60, appendix A. The Method 24 determination may be performed by the manufacturer of the material and the results provided to the Permittee.
 - (2) If these values cannot be determined using Method 24, the Permittee shall submit an alternative technique for determining their values for approval by the Administrator.
 - (3) The Permittee may rely on formulation data, subject to the following, in accordance with the provisions of 40 CFR 63.827(c)(3):
 - (A) The Permittee may determine the volatile matter content of materials based on formulation data, and may rely on volatile matter content data provided by material suppliers; and

(B) In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR part 60, appendix A, the applicable test method shall govern, unless after consultation, the Permittee can demonstrate to the satisfaction of the enforcement agency that the formulation data are correct.

(b) Pursuant to 40 CFR 63.825(e), the Permittee shall calculate the monthly allowable HAP emissions, H_a , as follows:

- (1) Determine the as-purchased mass of each ink, coating, varnish, adhesive, primer, and other solids-containing material applied each month, M_i .
- (2) Determine the as-purchased solids content of each ink, coating, varnish, adhesive, primer, and other solids-containing material applied each month, in accordance with 40 CFR 63.827(c)(2), C_{si} , and part (a) above.
- (3) Determine the as-purchased mass fraction of each ink, coating, varnish, adhesive, primer, and other solids-containing material which was applied at 20 weight-percent or greater solids content, on an as-applied basis, G_i .
- (4) Determine the total mass of each solvent, diluent, thinner, or reducer added to materials which were applied at less than 20 weight-percent solids content, on an as-applied basis, each month, M_{Lj} .
- (5) Calculate the monthly allowable HAP emissions, H_a , using the following equation:

$$H_a = 0.20 \left[\sum_{i=1}^p M_i G_i C_{si} \right] + 0.04 \left[\sum_{i=1}^p M_i (1 - G_i) + \sum_{j=1}^q M_{Lj} \right]$$

(c) Pursuant to 40 CFR 63.825(g), the Permittee shall determine the mass of organic HAP emitted using the following procedure:

- (1) Determine the sum of the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on intermittently-controllable work stations in bypass mode and the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on never-controlled work stations during the month, M_{Bi} .
- (2) Determine the sum of the mass of all solvents, reducers, thinners, and other diluents which are applied on intermittently-controllable work stations in bypass mode and the mass of all solvents, reducers, thinners, and other diluents which are applied on never-controlled work stations during the month, M_{Bj} .
- (3) Determine the sum of the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on intermittently-controllable work stations in controlled mode and the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on always-controlled work stations during the month, M_{Ci} .

- (4) Determine the sum of the mass of all solvents, reducers, thinners, and other diluents which are applied on intermittently-controllable work stations in controlled mode and the mass of all solvents, reducers, thinners, and other diluents which are applied on always-controlled work stations during the month, M_{Cj} .
- (5) Calculate the organic HAP emitted during the month using the following equation:

$$H = \left[\sum_{i=1}^p M_{Ci} C_{hi} + \sum_{j=1}^q M_{Cj} C_{hj} \right] * \left[1 - \left(\frac{E}{100} * \frac{F}{100} \right) \right] + \left[\sum_{i=1}^p M_{Bi} C_{hi} + \sum_{j=1}^q M_{Bj} C_{hj} \right]$$

where the symbols of this equation are defined in 40 CFR 63.822 (Definitions).

D.6.8 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.6.1 and D.6.4 shall be determined pursuant to 326 IAC 8-1-2(a) and 326 IAC 8-1-4(a)(3) using formulation data supplied by the coating manufacturer.

D.6.9 VOC Emissions

Compliance with Condition D.6.4 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the twelve (12) month period.

D.6.10 Volatile Organic Compounds (VOC) Control

- (a) The catalytic and thermal oxidizers controlling VOC emissions from Presses #1 through #4 (emission units P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U8) shall be in operation at all times that these units are in operation to ensure compliance with condition D.6.4.
- (b) The catalytic oxidizing incinerator identified as OXD#1 shall maintain a minimum operating temperature of 650°F during operation or a temperature that has been determined from the most recent compliant stack tests to maintain compliance with condition D.6.4.
- (c) The catalytic oxidizing incinerators identified as OXD#2, and OXD#3 shall each maintain a minimum operating temperature of 600°F during operation or a temperature that has been determined from the most recent compliant stack tests to maintain compliance with condition D.6.4.
- (d) The thermal oxidizing incinerator identified as OXD #4 shall maintain a minimum operating temperature of 1,500°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain compliance with condition D.6.4.
- (e) The catalytic oxidizing incinerator identified as OXD #5 shall maintain a minimum operating temperature of 600°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain compliance with condition D.6.4.

Note: The use of the oxidizers to control VOC emissions from Presses #1 through #4 to comply with the PSD minor VOC emission limitation was voluntarily proposed by the source. Therefore, the source may apply for a modification to remove the requirement to operate the oxidizers at all times that any of the presses are in operation under this Alternative Operating Scenario at any time if compliance with the PSD minor VOC emission limit can be achieved by other means.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.6.11 Parametric Monitoring

A continuous monitoring system shall be calibrated, maintained, and operated on each of the oxidizers for measuring operating temperature. The output of these systems shall be recorded, and the temperature for each oxidizer shall be greater than or equal to the temperature used to demonstrate compliance during the most recent compliance stack test.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.6.12 Contemporaneous Log for Alternate Operating Scenarios [326 IAC 2-7-5(9)]

- (a) Pursuant to 326 IAC 2-7-5(9)(A), contemporaneously with making a change from one alternative operating scenario to another, the Permittee shall make a record in a log at the permitted facility of the scenario under which it is operating. The record should state the alternative operating scenario for each station, since different stations at the same press may be operating under different scenarios.
- (b) The records required in paragraph (a) of this condition shall be maintained in accordance with the requirements of Condition C.20 and 326 IAC 8-1-9(c).

D.6.13 Record Keeping Requirements [326 IAC 8-1-10]

- (a) Pursuant to 326 IAC 8-1-10(c) (Compliance Certification, Record Keeping and Reporting Requirements for Certain Coating Facilities Using Compliant Coatings), upon changing the method of compliance for an existing coating facility from control devices (326 IAC 8-5-5(c)(3)(B)) to the use of compliant coatings (326 IAC 8-5-5(c)(1), (2), or (4)), the Permittee shall for each coating facility and for each coating used collect and record each day and maintain all of the following information:
 - (1) The name and identification number of each coating, as applied;
 - (2) The mass of VOC (excluding water and exempt compounds) per volume of coating for each coating, as applied, or the VOC content of each coating, as applied, expressed in units necessary to determine compliance;
 - (3) As new compliant coatings are added to a coating facility, the records required by this condition shall be updated to include the new coating; and
 - (4) If use of a coating is discontinued, the records required by this section shall be maintained consistent with 326 IAC 8-1-9(c).
- (b) The records required in paragraph (a) of this condition shall be maintained in accordance with the requirements of Condition C.20 and 326 IAC 8-1-9(c).

D.6.14 Record Keeping Requirements [40 CFR 63.829] [326 IAC 20-18-1] [326 IAC 2-4.1]

- (a) Pursuant to the Printing and Publishing Industry NESHAP, the Permittee shall maintain records of all measurements needed to demonstrate compliance with Condition D.6.3 on a monthly basis. These records shall include at a minimum the following specified in 40 CFR 63.10(b)(2) (General Provisions) that are applicable:
 - (1) All required measurements needed to demonstrate compliance with Condition D.6.3 (including, but not limited to, 15-minute averages of CMS data, raw performance testing measurements, raw performance evaluation measurements, control device and capture system operating parameter data, material usage, HAP usage, volatile matter usage, and solids usage that support data that the source is required to report); and
 - (2) All documentation supporting initial notifications of compliance status under 40 CFR 63.9 (General Provisions).
- (b) The records required in paragraph (a) of this condition shall be maintained in accordance with the following requirements of 40 CFR 63.10(b)(1) (General Provisions):
 - (1) The Permittee shall maintain files of all information (including all reports and notifications) required by this rule recorded in a form suitable and readily available for expeditious inspection and review.
 - (2) The files shall be retained for at least five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent two years of data shall be retained on site. The remaining three years of data may be retained off site.
 - (3) Such files may be maintained on microfilm, on a computer, on computer floppy disks, on magnetic tape disks, or on microfiche.

D.6.15 Record Keeping Requirements

- (a) To document compliance with Condition D.6.4, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limit and/or the VOC emission limit established in Condition D.6.4.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;
 - (2) A log of the dates of use;
 - (3) The total VOC usage for each month at each press while operating the incinerators;
 - (4) The weight of VOCs emitted for each compliance period for each press; and
 - (5) The continuous temperature records for the catalytic and thermal incinerators and the temperature used to demonstrate compliance during the most recent compliance stack test.

- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.6.16 Reporting Requirements [326 IAC 8-1-10]

- (a) Pursuant to 326 IAC 8-5-5(c)(1), (2), or (4) and 326 IAC 8-1-10(d), the Permittee shall notify IDEM, OAQ in either of the following instances:
- (1) Any record showing use of any noncompliant coatings shall be reported by submitting a copy of the record to IDEM, OAQ within thirty (30) days following use; such record shall also be submitted with the quarterly compliance monitoring report attached to this permit. The following information shall accompany each submittal:
 - (A) Name and location of the coating facility;
 - (B) Time, date, and duration of the noncompliance; and
 - (C) Corrective action taken.
 - (2) At least thirty (30) calendar days before changing the method of compliance from the use of compliant coatings (326 IAC 8-5-5(c)(1), (2), or (4)) to control devices (326 IAC 8-5-5(c)(3)(B)), the Permittee shall comply with all requirements of 326 IAC 8-1-12(b) of this rule, respectively. Upon changing the method of compliance for a coating facility from the use of compliant coatings to control devices, the Permittee shall comply with all requirements of 326 IAC 8-1-12.
- (b) Pursuant to 326 IAC 8-1-10(b), upon changing the method of compliance for an existing coating facility from control devices (326 IAC 8-5-5(c)(3)(B)) to the use of compliant coatings (326 IAC 8-5-5(c)(1), (2), or (4)), the Permittee shall certify to IDEM, OAQ that the coating facility is in compliance with the requirements of 326 IAC 8-1-10. The certification shall include the following:
- (1) The name and location of the source;
 - (2) The name, address, and telephone number of the person responsible for the source;
 - (3) Identification of each VOC emitting coating facility and identification of the applicable emission limitation;
 - (4) The name and identification number of each coating, as applied, used at each coating facility; and
 - (5) The mass of VOC (excluding water and exempt compounds) per volume of coating and the volume of each coating, as applied.

D.6.17 Reporting Requirements

- (a) A quarterly summary of the information to document compliance with Condition D.6.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within

thirty (30) days after the end of the quarter being reported. This quarterly summary report can be submitted in the same summary report required for Alternative Operating Scenarios 1 through 5 and 7 through 10 in Conditions D.1.17(a), D.2.17(a), D.3.17(a), D.4.17(a), D.5.17(a), D.7.21(a), D.8.21(a), D.9.21(a), and D.10.21(a). The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) Pursuant to 326 IAC 2-7-5(9)(C), the Permittee shall include a summary of the records required under Condition D.6.12 in the annual compliance certification submitted under 326 IAC 2-7-6(5) and Condition B.11.

D.6.18 Reporting Requirements [40CFR 63.830] [326 IAC 20-18-1] [326 IAC 2-4.1]

Pursuant to the Printing and Publishing Industry NESHAP, the Permittee shall submit the reports and plans listed below to the following addresses:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (a) A Notification of Compliance Status specified in 40 CFR 63.9(h) (General Provisions). This notification can be submitted in the same notification required for Alternative Operating Scenarios 1 through 5 and 7 through 10 in Conditions D.1.18(a), D.2.18(a), D.3.18(a), D.4.18(a), D.5.18(a), D.7.22(b), D.8.22(b), D.9.22(b), and D.10.22(b).
- (b) A summary report specified in 40 CFR 63.10(e)(3) (General Provisions) shall be submitted on a semi-annual basis (i.e., once every six-month period). In addition to a report of operating parameter exceedances as required by 40 CFR 63.10(e)(3)(i) (General Provisions), the summary report shall include exceedances of the standards in Condition D.6.3. This summary report can be submitted in the same summary report required for Alternative Operating Scenarios 1 through 5 and 7 through 10 in Conditions D.1.18(b), D.2.18(b), D.3.18(b), D.4.18(b), D.5.18(b), D.7.22(e), D.8.22(e), D.9.22(e), and D.10.22(e).

SECTION D.7 **FACILITY OPERATION CONDITIONS**
Alternative Operating Scenario 7 for Printing Stations Using Solvent-Based Materials

Facility Description [326 IAC 2-7-5(15)] - The following packaging rotogravure printing operations:

- (1) one (1) ten (10) station packaging rotogravure printing press identified as Press #1 (ten stations: P1U1 through P1U10), constructed in May of 1990, with a maximum line speed of 840 feet per minute (ft/min) when printing with ink and 740 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system with a total heat input rate of 7.76 million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) emissions from P1U1-P1U10 are controlled by one of the following:
 - (a) a single catalytic oxidizing incinerator identified as OXD#1 exhausting through one (1) stack (S/V ID: S-OXD1); or
 - (b) a single catalytic oxidizing incinerator identified as OXD#2 exhausting through one (1) stack (S/V ID: S-OXD2); or
 - (c) two (2) catalytic oxidizing incinerators configured in parallel, respectively identified as OXD#1 and OXD#2, with each incinerator exhausting through one (1) stack (S/V ID: S-OXD1 and S-OXD2), respectively.
- (2) one (1) nine (9) station packaging rotogravure printing press identified as Press #2 (nine stations: P2U1 through P2U9), constructed in April of 1991, with a maximum line speed of 840 feet per minute (ft/min) when printing with ink and 740 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system with a total heat input rate of 7.76 million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) emissions from P2U1-P2U9 are controlled by one of the following:
 - (a) a single catalytic oxidizing incinerator identified as OXD#2 exhausting through one (1) stack (S/V ID: S-OXD2); or
 - (b) a single catalytic oxidizing incinerator identified as OXD #5 exhausting through one (1) stack (S/V ID: S-OXD5); or
 - (c) two (2) catalytic oxidizing incinerators configured in parallel, respectively identified as OXD#2 and OXD#5, with each incinerator exhausting through one (1) stack (S/V ID: S-OXD2 and S-OXD5), respectively.
- (3) one (1) eight (8) station packaging rotogravure printing press identified as Press #3 (eight stations: P3U1 through P3U8), constructed in April of 1997, with a maximum line speed of 800 ft/min when printing with ink and 700 ft/min when printing with ink and adhesive. The volatile organic compound (VOC) emissions from P3U1-P3U8 are controlled by one catalytic oxidizing incinerator identified as OXD#5 exhausting through one (1) stack (S/V ID: S-OXD5).
- (4) one (1) eight (8) station packaging rotogravure printing press identified as Press #4 (eight stations: P4U1 through P4U8), constructed in January of 1997, with a maximum line speed of 800 feet per minute (ft/min) when printing with ink and 700 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system with a total heat input rate of twelve (12) million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) emissions from P4U1-P4U8 are controlled by one of the following:
 - (a) a single catalytic oxidizing incinerator identified as OXD#3 exhausting through one (1) stack (S/V ID: S-OXD3); or
 - (b) a single thermal oxidizing incinerator identified as OXD#4 exhausting through one (1) stack (S/V ID: S-OXD4); or
 - (c) catalytic and thermal oxidizing incinerators configured in parallel, respectively identified

as OXD#3 and OXD#4, with each incinerator exhausting through one (1) stack (S/V ID: S-OXD3 and S-OXD4), respectively.
(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.7.1 Graphic Arts Operations [326 IAC 8-5-5] [326 IAC 8-1-12]

- (a) Pursuant to 326 IAC 8-5-5(c)(3)(B) (Graphic Arts Operations), the Permittee may not cause, allow, or permit the operation of the facility unless the Permittee installs and operates an incineration system(s) that oxidizes at least ninety percent (90%) of the nonmethane volatile organic compounds (volatile organic compounds measured as total combustible carbon) to carbon dioxide and water.
- (b) A capture system must be used in conjunction with each emission control system. The capture system shall attain an efficiency sufficient to achieve an overall control efficiency, in conjunction with the emission control system, of sixty-five percent (65%) for packaging rotogravure processes.
- (c) Pursuant to 326 IAC 8-5-5(c)(3)(B), the following shall apply:
 - (1) The catalytic oxidizing incinerator identified as OXD#1 shall maintain a minimum operating temperature of 650°F or at least a temperature determined in the most recent compliance tests (described in Condition D.7.8) to maintain a minimum 90% destruction of the nonmethane VOC captured.
 - (2) The catalytic oxidizing incinerators identified as OXD#2, and OXD#3 shall each maintain a minimum operating temperature of 600°F or at least a temperature determined in the most recent compliance tests (described in Condition D.7.8) to maintain a minimum 90% destruction of the nonmethane VOC captured.
 - (3) The thermal oxidizing incinerator identified as OXD #4 shall maintain a minimum operating temperature of 1,500°F or at least a temperature determined in the most recent compliance tests (described in Condition D.7.8) to maintain a minimum 90% destruction of the nonmethane VOC captured.
 - (4) The catalytic oxidizing incinerator identified as OXD #5 shall maintain a minimum operating temperature of 600°F or at least a temperature determined in the most recent compliance tests (described in Condition D.7.8) to maintain a minimum 90% destruction of the nonmethane VOC captured.
- (d) Pursuant to 326 IAC 8-1-12 (Compliance Certification, Record Keeping and Reporting Requirements for Certain Coating Facilities Using Control Devices), this facility is subject to the following requirements when utilizing a thermal and/or catalytic oxidizer to comply with 326 IAC 8-5-5(c)(3)(B):
 - (1) Each incineration control system shall be operated and maintained according to the manufacturer's recommendations but may be modified based on the results of the initial or subsequent compliance test or upon the written request of IDEM, OAQ.

- (2) A copy of the operating and maintenance procedures shall be maintained in a convenient location at the source property and as close to each control system as possible for reference by plant personnel and IDEM, OAQ inspectors.

D.7.2 General Provisions Relating to HAPs [326 IAC 20-1-1] [40 CFR Part 63, Subpart A] [326 IAC 2-4.1]

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section, as specified in Table 1 of 40 CFR 63, Subpart KK.

D.7.3 Printing and Publishing Industry NESHAP [326 IAC 20-18-1] [40 CFR Part 63, Subpart KK] [326 IAC 2-4.1]

This facility is subject to 40 CFR 63, Subpart KK, which is incorporated by reference as 326 IAC 20-18-1. A copy of this rule is attached. The Permittee shall comply with all applicable provisions of this rule on and after May 30, 1999.

- (a) The four (4) packaging rotogravure printing presses (P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U8) shall limit emissions to no more than five (5) percent of the organic HAP applied for the month.
- (b) Pursuant to 40 CFR 63.825(b)(7), to demonstrate compliance with this standard, the Permittee shall, for each press, operate a capture system and control device and demonstrate an overall organic HAP control efficiency of at least 95 percent for each month. The Permittee shall demonstrate compliance in accordance with the following provisions of 40 CFR 63.825(d):
 - (1) The Permittee shall demonstrate compliance through performance tests of capture efficiency and control device efficiency following the procedures in Condition D.7.9(a); and
 - (2) The Permittee shall demonstrate continuing compliance through continuous monitoring of capture system and control device operating parameters following the procedures in Condition D.7.14.
- (c) The Permittee shall determine the organic HAP emissions for the affected source for the month by summing all organic HAP emissions calculated according to Condition D.7.9(b) and (c). The source is in compliance for the month if:
 - (1) All operating parameters required to be monitored under Condition D.7.14 were maintained at the appropriate values; and
 - (2) The total mass of organic HAP emitted by the source was not more than five percent of the total mass of organic HAP applied by the source. The total mass of organic HAP applied by the affected source in the month shall be determined by the Permittee using the following equation:

$$H = \sum_{i=1}^P M_i C_{hi} + \sum_{j=1}^q M_j C_{hj}$$

where the symbols of this equation are defined in 40 CFR 63.822(b).

D.7.4 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

The source-wide potential to emit VOC is limited to less than 250 tons per year to be a minor source under 326 IAC 2-2 (PSD) and 40 CFR 52.21. The total input VOC, including coatings, dilution solvents, and cleaning solvents, to Presses #1 through #4 (emission units P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U8) shall be limited to 3,458 tons per twelve (12) consecutive month period. VOC emissions from each press shall be controlled by a capture and incineration system that achieves a minimum overall VOC control efficiency of 94%. This usage limitation will then be equivalent to a VOC emission limitation of 207.5 tons per year.

The above emission limits including VOC limits from Alternative Operating Scenarios 1 through 6 and 8 through 10 and VOC emissions from natural gas combustion, solvent degreasing and the insignificant activities will limit source-wide VOC emissions to less than 250 tons per year.

D.7.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and the control devices.

D.7.6 Startup, Shutdown, and Malfunction Plan [40 CFR 63.6(e)(3) General Provisions][326 IAC 20-1-1] [326 IAC 2-4.1]

Pursuant to the Printing and Publishing Industry NESHAP, the Permittee shall develop and implement a written startup, shutdown, and malfunction (SSM) plan that describes, in detail, procedures for operating and maintaining the facility during periods of startup, shutdown, and malfunction and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with 40 CFR 63, Subpart KK. As required under 40 CFR 63.8(c)(1)(i) (General Provisions), the plan shall identify all routine or otherwise predictable continuous monitoring system (CMS) malfunctions. This plan shall have been developed by the Permittee by the facility's compliance date, May 30, 1999. The plan shall be incorporated by reference into the source's Part 70 permit.

(a) The purpose of the SSM plan is to –

- (1) Ensure that, at all times, the Permittee operates and maintains the facility, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions at least to the level required by the rule;
- (2) Ensure that the Permittee is prepared to correct malfunctions as soon as practicable after their occurrence in order to minimize excess emissions of HAP; and
- (3) Reduce the reporting burden associated with periods of startup, shutdown, and malfunction (including corrective action taken to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation).

(b) During periods of startup, shutdown, and malfunction, the Permittee shall operate and maintain the facility (including associated air pollution control equipment) in accordance with the procedures specified in the SSM plan developed under this condition.

(c) Record keeping associated with the SSM plan is identified in Condition D.7.17. Reporting associated with the SSM plan is identified in Condition D.7.22.

- (d) The Permittee shall keep the written SSM plan on record after it is developed to be made available for inspection, upon request, by IDEM, OAQ for the life of the facility or until the facility is no longer subject to this rule. In addition, if the SSM plan is revised, the Permittee shall keep previous (i.e., superseded) versions of the SSM plan on record, to be made available for inspection, upon request, by IDEM, OAQ, for a period of 5 years after each revision to the plan. Revisions to the SSM plan are automatically incorporated by reference and do not require a permit revision.
- (e) To satisfy the requirements of this condition, the Permittee may use the facility's standard operating procedures (SOP) manual, or an Occupational Safety and Health Administration (OSHA) or other plan, provided the alternative plans meet all the requirements of this condition and are made available for inspection when requested by IDEM, OAQ.
- (f) IDEM, OAQ shall determine whether acceptable operation and maintenance procedures are being used, based on information available to IDEM, OAQ, which may include, but is not limited to, monitoring results, review of operation and maintenance procedures (including the SSM plan required in this condition), review of operation and maintenance records, and inspection of the facility.

Based on the results of such determination, IDEM, OAQ may require that the Permittee make changes to the SSM plan for the facility. IDEM, OAQ may require reasonable revisions to a SSM plan, if IDEM, OAQ finds that the plan:

- (1) Does not address a startup, shutdown, or malfunction event that has occurred;
 - (2) Fails to provide for the operation of the facility (including associated air pollution control equipment) during a startup, shutdown, or malfunction event in a manner consistent with good air pollution control practices for minimizing emissions at least to the levels required by all relevant standards; or
 - (3) Does not provide adequate procedures for correcting malfunctioning process and/or air pollution control equipment as quickly as practicable.
- (g) If the SSM plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction but was not included in the SSM plan at the time the Permittee developed the plan, the Permittee shall revise the SSM plan within forty-five (45) days after the event to include detailed procedures for operating and maintaining the facility during similar malfunction events and a program of corrective action for similar malfunctions of process or air pollution control equipment.

D.7.7 Enforcement Action [Agreed Order A-3820]

The Permittee shall comply with Agreed Order #A-3820, effective November 30, 1998. The Agreed Order is effective for a period of four (4) years from the Effective Date of the Agreed Order.

Compliance Determination Requirements

D.7.8 Testing Requirements [326 IAC 8-1-12]

Pursuant to 326 IAC 8-5-5(c)(3)(B) and 326 IAC 8-1-12, each incineration control system shall be tested according to the following schedule and in the following situations:

- (a) An initial compliance test shall be conducted. Compliance tests shall be conducted no later than every thirty (30) months after the date of the initial test.
- (b) A compliance test shall be conducted whenever the Permittee chooses to operate a control system under conditions different from those that were in place at the time of the previous test.
- (c) A compliance test shall be performed within ninety (90) days of:
 - (1) Startup of a new coating facility;
 - (2) Changing the method of compliance for an existing coating facility from compliant coatings or daily-weighted averaging to control devices; or
 - (3) Receipt of a written request from IDEM, OAQ or the U.S. EPA.
- (d) All compliance tests shall be conducted according to a protocol approved by IDEM, OAQ at least thirty (30) days before the test. The protocol shall contain, at a minimum, the following information:
 - (1) Test procedures;
 - (2) Operating and control system parameters;
 - (3) Type of VOC containing process material being used; and
 - (4) The process and control system parameters that will be monitored during the test.

D.7.9 Testing Requirements [40 CFR Part 63, Subpart KK] [326 IAC 20-18-1] [326 IAC 2-4.1]

Pursuant to the Printing and Publishing Industry NESHAP, the Permittee shall comply with the following requirements:

- (a) Pursuant to 40 CFR 63.825(d)(1), the Permittee shall demonstrate initial compliance through performance tests of capture efficiency and control device efficiency and continuing compliance through continuous monitoring of capture system and control device operating parameters following the procedures outlined below.
 - (1) Determine the oxidizer destruction efficiency (E) for each of the control devices using the following procedure:
 - (A) An initial performance test to establish the destruction efficiency and the associated combustion zone temperature for each oxidizer shall be conducted and the data reduced in accordance with the following reference methods and procedures:
 - (i) Method 1 or 1A of 40 CFR 60, Appendix A is used for sample and velocity traverses to determine sampling locations.
 - (ii) Method 2, 2A, 2C, or 2D of 40 CFR 60, Appendix A is used to determine gas volumetric flow rate.

- (iii) Method 3 of 40 CFR 60, Appendix A is used for gas analysis to determine dry molecular weight.
- (iv) Method 4 of 40 CFR 60, Appendix A is used to determine stack gas moisture.
- (v) Methods 2, 2A, 3, and 4 of 40 CFR 60, Appendix A shall be performed, as applicable, at least twice during each test period.
- (vi) Method 25 of 40 CFR 60, Appendix A, shall be used to determine organic volatile matter concentration, except as provided in (a) through (c) below. The Permittee shall submit notice of the intended test method to IDEM, OAQ for approval along with notice of performance test required under 40 CFR 63.7(c) (General Provisions). The Permittee may use Method 25A of 40 CFR 60, Appendix A, if:
 - (a) An exhaust gas organic volatile matter concentration of 50 parts per million by volume (ppmv) or less is required to comply with Condition D.1.3; or
 - (b) The organic volatile matter concentration at the inlet to the control system and the required level of control are such to result in exhaust gas organic volatile matter concentrations of 50 ppmv or less; or
 - (c) Because of the high efficiency of the control device, the anticipated organic volatile matter concentration at the control device exhaust is 50 ppmv or less, regardless of inlet concentration.
- (vii) Each performance test shall consist of three separate runs; each run conducted for at least one hour under the conditions that exist when the affected source is operating under normal operating conditions. For the purpose of determining organic volatile matter concentrations and mass flow rates, the average of results of all runs shall apply.
- (viii) Organic volatile matter mass flow rates shall be determined using the following equation:

$$M_f = Q_{sd} \sum_{i=1}^n C_i M W_i [0.0416] [10^{-6}]$$

where the symbols of this equation are defined in 40 CFR 63.822 (Definitions).

- (ix) Emission control device efficiency shall be determined using the following equation:

$$E = [M_{fi} - M_{fo}] / M_{fi}$$

where the symbols of this equation are defined in 40 CFR 63.822 (Definitions).

- (B) The Permittee shall record such process information as may be necessary to determine the conditions of the performance test. Operations during periods of start-up, shutdown, and malfunction shall not constitute representative conditions for the purpose of a performance test.
- (C) For the purpose of determining the value of the oxidizer operating parameter that will demonstrate continuing compliance, the time-weighted average of the values recorded during the performance test shall be computed. For each thermal oxidizer, the Permittee shall establish as the operating parameter the minimum combustion temperature. For each catalytic oxidizer, the Permittee shall establish as the operating parameter the minimum gas temperature upstream of the catalyst bed. These minimum temperatures are the operating parameter values that demonstrate continuing compliance with the requirements of Condition D.7.3.
- (2) Pursuant to 40 CFR 63.827(e)(1), determine the capture system capture efficiency (F) of each capture system venting organic emissions to a control device for the purposes of meeting the requirements of Condition D.7.3 by conducting a performance test in accordance with Procedure T – Criteria for and Verification of a Permanent or Temporary Total Enclosure as found in 40 CFR 52.741, Appendix B to confirm that an enclosure meets the requirements for permanent total enclosure. For permanent total enclosures, capture efficiency shall be assumed as 100 percent.
- (3) Calculate the overall organic HAP control efficiency, (R), achieved by each control device and capture system using the following equation:
- $$R = EF / 100$$
- where E and F are determined according to paragraphs (a)(1) and (2) of this condition.
- (4) Based on stack tests conducted in November and December of 1999 and June of 2000, the Permittee shall operate the oxidizers at all times the presses are in operation, maintain the 100 percent capture efficiencies, and demonstrate continuous compliance in accordance with the following:
- (A) The catalytic oxidizing incinerator identified as OXD#1 shall maintain a minimum operating temperature of 650°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain compliance with Conditions D.7.3, and D.7.9(c).

- (B) The catalytic oxidizing incinerators identified as OXD#2 and OXD#3 shall each maintain a minimum operating temperature of 600°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain compliance with Conditions D.7.3, and D.7.9(c).
 - (C) The thermal oxidizing incinerator identified as OXD#4 shall maintain a minimum operating temperature of 1,500°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain compliance with Conditions D.7.3, and D.7.9(c).
 - (D) The catalytic oxidizing incinerator identified as OXD#5 shall maintain a minimum operating temperature of 600°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain compliance with Conditions D.7.3, and D.7.9(c).
- (b) Pursuant to 40 CFR 63.825(g), the Permittee shall determine the mass of organic HAP emitted using the following procedure:
- (1) Determine the sum of the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on intermittently-controllable work stations in bypass mode and the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on never-controlled work stations during the month, M_{Bi} .
 - (2) Determine the sum of the mass of all solvents, reducers, thinners, and other diluents which are applied on intermittently-controllable work stations in bypass mode and the mass of all solvents, reducers, thinners, and other diluents which are applied on never-controlled work stations during the month, M_{Bj} .
 - (3) Determine the sum of the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on intermittently-controllable work stations in controlled mode and the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on always-controlled work stations during the month, M_{Ci} .
 - (4) Determine the sum of the mass of all solvents, reducers, thinners, and other diluents which are applied on intermittently-controllable work stations in controlled mode and the mass of all solvents, reducers, thinners, and other diluents which are applied on always-controlled work stations during the month, M_{Cj} .
 - (5) Calculate the organic HAP emitted during the month using the following equation:

$$H = \left[\sum_{i=1}^p M_{Ci} C_{hi} + \sum_{j=1}^q M_{Cj} C_{hj} \right] * \left[1 - \left(\frac{E}{100} * \frac{F}{100} \right) \right] + \left[\sum_{i=1}^p M_{Bi} C_{hi} + \sum_{j=1}^q M_{Bj} C_{hj} \right]$$

where the symbols of this equation are defined in 40 CFR 63.822 (Definitions).

- (c) Pursuant to 40 CFR 63.825(d)(1)(xi), the Permittee is in compliance if the oxidizers are operated such that the average combustion temperature or average temperature upstream of the catalyst bed is greater than the operating parameter established in accordance with 40 CFR 63.828(a)(4) and Condition D.7.3 for each three-hour period, and the overall organic HAP control efficiency, R, is 95 percent or greater.
- (d) Pursuant to 40 CFR 63.827(c)(2), the Permittee shall determine the volatile matter and solids content of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers, diluents, and other materials applied by following the procedure below.
 - (1) The Permittee shall determine the volatile matter and solids weight-fraction of each ink, coating, varnish, adhesive, primer, solvent, reducer, thinner, diluent, and other material applied using Method 24 of 40 CFR part 60, appendix A. The Method 24 determination may be performed by the manufacturer of the material and the results provided to the Permittee.
 - (2) If these values cannot be determined using Method 24, the Permittee shall submit an alternative technique for determining their values for approval by the Administrator.
 - (3) The Permittee may rely on formulation data, subject to the following, in accordance with the provisions of 40 CFR 63.827(c)(3):
 - (A) The Permittee may determine the volatile matter content of materials based on formulation data, and may rely on volatile matter content data provided by material suppliers; and
 - (B) In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR part 60, appendix A, the applicable test method shall govern, unless after consultation, the Permittee can demonstrate to the satisfaction of the enforcement agency that the formulation data are correct.

D.7.10 Testing Requirements [Agreed Order A-3820]

Pursuant to Agreed Order A-3820, effective November 30, 1998, the Permittee shall conduct annual VOC testing at Presses Nos. 1, 2, 3, and 4 to demonstrate compliance with 326 IAC 8-5-5 and applicable permit conditions. This testing shall be conducted in accordance with the requirements of 326 IAC 3-6, Source Sampling Procedures. The Permittee shall conduct the first of these tests within the fourth quarter of 1999. Subsequent tests shall be conducted during the fourth quarter of each consecutive year. This requirement shall cease after the tests conducted in the fourth quarter 2000 provided that the Permittee demonstrated complete compliance with 326 IAC 8-5-5 and applicable permit conditions during both the 1999 and 2000 tests. The performance of annual VOC testing under this Order shall otherwise satisfy any similar VOC testing requirements imposed on the Permittee under its air permits for the period of the Agreed Order.

D.7.11 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.7.1 and D.7.4 shall be determined pursuant to 326 IAC 8-1-2(a) and 326 IAC 8-1-4(a)(3) using formulation data supplied by the coating manufacturer.

D.7.12 VOC Emissions

Compliance with Condition D.7.4 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the twelve (12) month period.

D.7.13 Volatile Organic Compounds (VOC) Control

- (a) The catalytic and thermal oxidizers controlling VOC emissions from Presses #1 through #4 (emission units P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U8) shall be in operation at all times that these units are in operation to ensure compliance with condition D.7.4.
- (b) The catalytic oxidizing incinerator identified as OXD#1 shall maintain a minimum operating temperature of 650°F during operation or a temperature that has been determined from the most recent compliant stack tests to maintain compliance with condition D.7.4.
- (c) The catalytic oxidizing incinerators identified as OXD#2, and OXD#3 shall each maintain a minimum operating temperature of 600°F during operation or a temperature that has been determined from the most recent compliant stack tests to maintain compliance with condition D.7.4.
- (d) The thermal oxidizing incinerator identified as OXD #4 shall maintain a minimum operating temperature of 1,500°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain compliance with condition D.7.4.
- (e) The catalytic oxidizing incinerator identified as OXD #5 shall maintain a minimum operating temperature of 600°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain compliance with condition D.7.4.

Note: The use of the oxidizers to control VOC emissions from Presses #1 through #4 to comply with the PSD minor VOC emission limitation was voluntarily proposed by the source. Therefore, the source may apply for a modification to remove the requirement to operate the oxidizers at all times that any of the presses are in operation under this Alternative Operating Scenario at any time if compliance with the PSD minor VOC emission limit can be achieved by other means.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.7.14 Monitoring Requirements [326 IAC 8-1-12]

Pursuant to 326 IAC 8-5-5(c)(3)(B) and 326 IAC 8-1-12, the monitoring equipment requirements shall be as follows:

- (a) When the thermal incinerator is used for VOC reduction, a temperature monitoring device capable of continuously recording the temperature of the gas stream in the combustion zone of the incinerator shall be used. The temperature monitoring device shall have an accuracy of one percent (1%) of the temperature being measured in degrees Centigrade, or plus or minus five-tenths degree Centigrade ($\pm 0.5^{\circ}\text{C}$), whichever is more accurate; and
- (b) When a catalytic incinerator is used for VOC reduction, a temperature device capable of continuously recording the temperature in the gas stream immediately before and after the catalyst bed of each incinerator shall be used. The temperature monitoring device shall have an accuracy of one percent (1%) of the temperature being measured in degrees Centigrade, or plus or minus five-tenths degree Centigrade ($\pm 0.5^{\circ}\text{C}$), whichever is more accurate.

D.7.15 Monitoring Requirements [40 CFR 63.828] [326 IAC 20-18-1] [326 IAC 2-4.1]

Pursuant to the Printing and Publishing Industry NESHAP, following the date on which the initial performance test of a control device is completed, to demonstrate continuing compliance with the standard, the Permittee shall monitor and inspect each control device required to comply with Condition D.7.3 to ensure proper operation and maintenance by implementing the following requirements:

- (a) The Permittee shall, for each dryer associated with an intermittently-controllable work station, secure any bypass line valve in the closed position with a car-seal or a lock-and-key type configuration. A visual inspection of the seal or closure mechanism shall be performed at least once every month to ensure that the valve or damper is maintained in the closed position and the exhaust stream is not diverted through the bypass line.
- (b) For the thermal oxidizer, the Permittee shall install, calibrate, operate, and maintain a temperature monitoring device equipped with a continuous recorder. The device shall have an accuracy of ± 1 percent of the temperature being monitored in $^{\circ}\text{C}$ or $\pm 1^{\circ}\text{C}$, whichever is greater. The thermocouple or temperature sensor shall be installed in the combustion chamber at a location in the combustion zone.
- (c) For each catalytic oxidizer, the Permittee shall install, calibrate, operate, and maintain a temperature monitoring device equipped with a continuous recorder. The device shall be capable of monitoring temperature with an accuracy of ± 1 percent of the temperature being monitored in $^{\circ}\text{C}$ or $\pm 1^{\circ}\text{C}$, whichever is greater. The thermocouple or temperature sensor shall be installed in the vent stream at the nearest feasible point to the catalyst bed inlet.
- (d) All temperature monitoring equipment shall be installed, calibrated, maintained, and operated according to manufacturers' specifications. The calibration of the chart recorder, data logger, or temperature indicator shall be verified every three months; or the chart recorder, data logger, or temperature indicator shall be replaced. The replacement shall be done either if the Permittee chooses not to perform the calibration, or if the equipment cannot be calibrated properly.
- (e) Any excursion from the required operating parameters which are monitored in accordance with this condition and Condition D.7.9(a)(4) and (c), unless otherwise excused, shall be considered a violation of Condition D.7.3.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.7.16 Contemporaneous Log for Alternate Operating Scenarios [326 IAC 2-7-5(9)]

- (a) Pursuant to 326 IAC 2-7-5(9)(A), contemporaneously with making a change from one alternative operating scenario to another, the Permittee shall make a record in a log at the permitted facility of the scenario under which it is operating. The record should state the alternative operating scenario for each station, since different stations at the same press may be operating under different scenarios.
- (b) The records required in paragraph (a) of this condition shall be maintained in accordance with the requirements of Condition C.20 and 326 IAC 8-1-9(c).

D.7.17 Record Keeping Requirements [326 IAC 8-1-12]

- (a) Pursuant to 326 IAC 8-1-12(c), upon changing the method of compliance for an existing coating facility from the use of compliant coatings (326 IAC 8-5-5(c)(1), (2), or (4)) to control devices (326 IAC 8-5-5(c)(3)(B)), the Permittee shall collect and record each day and maintain all of the following information for each coating facility:
 - (1) The name and identification of each coating used at each coating facility.
 - (2) The mass of VOC per unit volume of coating solids, as applied, the volume solids content, as applied, and the volume, as applied, of each coating expressed in units necessary to determine compliance, used each day at each coating facility.
 - (3) The maximum VOC content (mass of VOC per unit volume of coating solids, as applied) or the daily weighted average VOC content (mass of VOC per unit volume of coating solids, as applied) of the coatings used each day on each coating facility.
 - (4) The required overall emission reduction efficiency for each day for each coating facility.
 - (5) The actual overall emission reduction efficiency achieved for each day for each coating facility as determined during the compliance test required by Condition D.7.8 pursuant to 326 IAC 8-1-12(b)(1)(C).
 - (6) Control device monitoring data as follows:
 - (A) For the thermal incinerator, the following:
 - (i) Continuous records of the temperature in the gas stream in the combustion zone of the incinerator; and
 - (ii) Records of all three (3) hour periods of operation in which the average combustion temperature of the gas stream in the combustion zone was more than fifty degrees Fahrenheit (50°F) (twenty-eight degrees Centigrade (28°C)) below the average combustion temperature that existed during the most recent test that demonstrated that the coating facility was in compliance.
 - (B) For each catalytic incinerator, the following:
 - (i) Continuous records of the temperature of the gas stream both upstream and downstream of the catalyst bed of the incinerator;
 - (ii) Records of all three (3) hour periods of operation in which the average temperature measured at the process vent stream immediately before the catalyst bed is more than fifty degrees Fahrenheit (50°F) (twenty-eight degrees Centigrade (28°C)) below the average temperature of the process vent stream that existed during the most recent test that demonstrated that the coating

facility was in compliance; and

- (iii) Records of all three (3) hour periods of operation in which the average temperature difference across the catalyst bed is less than eighty percent (80%) of the temperature difference measured during the most recent test that demonstrated that the coating facility was in compliance.
- (7) A log of operating time for each capture system, control device, monitoring equipment, and the associated coating facility.
- (8) A maintenance log for each capture system, control device, and monitoring equipment detailing all routine and nonroutine maintenance performed including dates and duration of any outages.
- (b) The records required in paragraph (a) of this condition shall be maintained in accordance with the requirements of Condition C.20 and 326 IAC 8-1-9(c).

D.7.18 Record Keeping Requirements [40 CFR 63.829] [326 IAC 20-18-1] [326 IAC 2-4.1]

- (a) Pursuant to the Printing and Publishing Industry NESHAP, the Permittee shall maintain the following records on a monthly basis:
 - (1) Records of all measurements needed to demonstrate compliance with Conditions D.7.3 and D.7.6. These records shall include at a minimum the following specified in 40 CFR 63.10(b)(2) (General Provisions) that are applicable:
 - (A) The occurrence and duration of each startup, shutdown, or malfunction of operation (i.e., process equipment);
 - (B) The occurrence and duration of each malfunction of the air pollution control equipment;
 - (C) All maintenance performed on the air pollution control equipment;
 - (D) Actions taken during periods of startup, shutdown, and malfunction (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation) when such actions are different from the procedures specified in the SSM plan required by Condition D.7.6;
 - (E) All information necessary to demonstrate conformance with the SSM plan required in Condition D.7.6 when all actions taken during periods of startup, shutdown, and malfunction (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation) are consistent with the procedures specified in such plan (The information needed to demonstrate conformance with the SSM plan may be recorded using a "checklist", or some other effective form or record keeping, in order to minimize the record keeping burden for

conforming events);

- (F) Each period during which a continuous monitoring system (CMS) is malfunctioning or inoperative (including out-of-control periods);
 - (G) All required measurements needed to demonstrate compliance with Condition D.7.3 (including, but not limited to, 15-minute averages of CMS data, raw performance testing measurements, raw performance evaluation measurements, and control device and capture system operating parameter data, that support data that the source is required to report);
 - (H) All results of performance tests and CMS performance evaluations;
 - (I) All measurements as may be necessary to determine the conditions of performance tests and performance evaluations;
 - (J) All CMS calibration checks;
 - (K) All adjustments and maintenance performed on CMS; and
 - (L) All documentation supporting initial notifications of compliance status under 40 CFR 63.9 (General Provisions).
- (2) Records for each CMS operated by the Permittee in accordance with the requirements of Condition D.7.14. These records are in addition to complying with the requirements specified in paragraph (a)(1) of this condition, and shall include at a minimum the following specified in 40 CFR 63.10(c) (General Provisions) that are applicable:
- (A) All required CMS measurements (including monitoring data recorded during unavoidable CMS breakdowns and out-of-control periods);
 - (B) The date and time identifying each period during which the CMS was inoperative except for zero (low-level) and high-level checks;
 - (C) The date and time identifying each period during which the CMS was out of control, as defined in 40 CFR 63.8(c)(7) (General Provisions);
 - (D) The specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions and parameter monitoring exceedances, as defined in the rule, that occurs during startups, shutdowns, and malfunctions of the facility;
 - (E) The specific identification (i.e., the date and time of commencement and completion) of each time period of excess emissions and parameter monitoring exceedances, as defined in the rule, that occurs during periods other than startups, shutdowns, and malfunctions of the facility;

- (F) The nature and cause of any malfunction (if known);
- (G) The corrective action taken or preventive measures adopted;
- (H) The nature of the repairs or adjustments to the CMS that was inoperative or out of control;
- (I) The total process operating time during the reporting period; and
- (J) All procedures that are part of a quality control program developed and implemented for CMS under 40 CFR 63.8(d) (General Provisions).

In order to satisfy the requirements of paragraphs (F) through (H) of this condition and to avoid duplicative record keeping efforts, the Permittee may use the SSM plan or records kept to satisfy the record keeping requirements of the SSM plan specified in Condition D.7.6, provided that such plan and records adequately address the requirements of paragraphs (F) through (H) of this condition.

- (b) The records required in paragraph (a) of this condition shall be maintained in accordance with the following requirements of 40 CFR 63.10(b)(1) (General Provisions):
 - (1) The Permittee shall maintain files of all information (including all reports and notifications) required by this rule recorded in a form suitable and readily available for expeditious inspection and review.
 - (2) The files shall be retained for at least five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent two years of data shall be retained on site. The remaining three years of data may be retained off site.
 - (3) Such files may be maintained on microfilm, on a computer, on computer floppy disks, on magnetic tape disks, or on microfiche.

D.7.19 Record Keeping Requirements

- (a) To document compliance with Condition D.7.4, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limit and/or the VOC emission limit established in Condition D.7.4.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;
 - (2) A log of the dates of use;
 - (3) The total VOC usage for each month at each press while operating the incinerators;
 - (4) The weight of VOCs emitted for each compliance period for each press; and

- (5) The continuous temperature records for the catalytic and thermal incinerators and the temperature used to demonstrate compliance during the most recent compliance stack test.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.7.20 Record Keeping Requirements [Agreed Order A-3820]

Pursuant to Agreed Order #A-3820, effective November 30, 1998, for a period of four (4) years, the Permittee shall maintain, and provide upon request, a record of all times that an incinerator is overloaded or shuts down and results in the triggering of the automatic press shut-off. This record should include the dates, times, and the presses and incinerators involved in each of these incidents.

D.7.21 Reporting Requirements [326 IAC 8-1-12]

Pursuant to 326 IAC 8-5-5(c)(3)(B) and 326 IAC 8-1-12, the Permittee shall notify IDEM, OAQ in either of the following instances:

- (a) Any record showing noncompliance with the applicable requirements for control devices shall be reported by submitting a copy of the record to IDEM, OAQ within thirty (30) days following noncompliance; such record shall also be submitted with the quarterly compliance monitoring report attached to this permit. The following information shall accompany each submittal:
 - (1) Name and location of the coating facility;
 - (2) Identification of the control system where the noncompliance occurred and the coating facility it served;
 - (3) Time, date and duration of the noncompliance; and
 - (4) Corrective action taken.
- (b) At least thirty (30) calendar days before changing the method of compliance from control devices (326 IAC 8-5-5(c)(3)(B)) to the use of compliant coatings (326 IAC 8-5-5(c)(1), (2), or (4)), the Permittee shall comply with all applicable requirements of 326 IAC 8-1-10(b). Upon changing the method of compliance from control devices to the use of compliant coatings, the Permittee shall comply with all requirements of 326 IAC 8-1-10(b), applicable to the coating facility subject to 326 IAC 8-5-5.

D.7.22 Reporting Requirements

- (a) A quarterly summary of the information to document compliance with Condition D.7.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. This quarterly summary report

can be submitted in the same summary report required for Alternative Operating Scenarios 1 through 6 and 8 through 10 in Conditions D.1.17(a), D.2.17(a), D.3.17(a), D.4.17(a), D.5.17(a), D.6.17(a), D.8.21(a), D.9.21(a), and D.10.21(a). The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) Pursuant to 326 IAC 2-7-5(9)(C), the Permittee shall include a summary of the records required under Condition D.7.15 in the annual compliance certification submitted under 326 IAC 2-7-6(5) and Condition B.11.

D.7.23 Reporting Requirements [40CFR 63.830] [326 IAC 20-18-1] [326 IAC 2-4.1]

Pursuant to the Printing and Publishing Industry NESHAP, the Permittee shall submit the reports and plans listed below to the following addresses:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (a) A Notification of Performance Tests specified in 40 CFR 63.7 and 63.9(e) (General Provisions). This notification, and the site-specific test plan required under 40 CFR 63.7(c)(2) (General Provisions) shall identify the operating parameter to be monitored to ensure that the capture efficiency measured during the performance test is maintained. The operating parameter identified in the site-specific test plan shall be considered to be approved unless explicitly disapproved, or unless comments received from IDEM, OAQ require monitoring of an alternate parameter.
- (b) A Notification of Compliance Status specified in 40 CFR 63.9(h) (General Provisions). This notification can be submitted in the same notification required for Alternative Operating Scenarios 1 through 6 and 8 through 10 in Conditions D.1.18(a), D.2.18(a), D.3.18(a), D.4.18(a), D.5.18(a), D.6.18(a), D.8.22(b), D.9.22(b), and D.10.22(b).
- (c) Performance test reports specified in 40 CFR 63.10(d)(2) (General Provisions).
- (d) Start-up, shutdown and malfunction (SSM) reports specified in 40 CFR 63.10(d)(5) (General Provisions).
 - (1) If actions taken by the Permittee during a start-up, shutdown, or malfunction of the facility (including actions taken to correct a malfunction) are not completely consistent with the procedures specified in the facility's SSM plan specified in Condition D.7.6, the Permittee shall report the actions taken for that event in strict accordance with 40 CFR 63.10(d)(5)(ii), i.e., within two (2) working days after

commencing actions inconsistent with the plan, followed by a letter within seven (7) working days after the end of the event. The SSM report shall consist of a letter containing the name, title, and signature of the responsible official who is certifying its accuracy; shall be submitted to IDEM, OAQ; and shall otherwise comply with the provisions of 40 CFR 63.10(d)(5)(ii).

- (2) Separate start-up, shutdown, or malfunction reports are not required if the information is included in the report specified in paragraph (e) of this condition.
- (e) A summary report specified in 40 CFR 63.10(e)(3) (General Provisions) shall be submitted on a semi-annual basis (i.e., once every six-month period). In addition to a report of operating parameter exceedances as required by 40 CFR 63.10(e)(3)(i) (General Provisions), the summary report shall include exceedances of the standards in Condition D.7.3. This summary report can be submitted in the same summary report required for Alternative Operating Scenarios 1 through 6 and 8 through 10 in Conditions D.1.18(b), D.2.18(b), D.3.18(b), D.4.18(b), D.5.18(b), D.6.18(b), D.8.22(e), D.9.22(e), and D.10.22(e).

SECTION D.8 **FACILITY OPERATION CONDITIONS**
Alternative Operating Scenario 8 for Printing Stations Using Solvent-Based Materials

Facility Description [326 IAC 2-7-5(15)] - The following packaging rotogravure printing operations:

- (1) one (1) ten (10) station packaging rotogravure printing press identified as Press #1 (ten stations: P1U1 through P1U10), constructed in May of 1990, with a maximum line speed of 840 feet per minute (ft/min) when printing with ink and 740 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system with a total heat input rate of 7.76 million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) emissions from P1U1-P1U10 are controlled by one of the following:
 - (a) a single catalytic oxidizing incinerator identified as OXD#1 exhausting through one (1) stack (S/V ID: S-OXD1); or
 - (b) a single catalytic oxidizing incinerator identified as OXD#2 exhausting through one (1) stack (S/V ID: S-OXD2); or
 - (c) two (2) catalytic oxidizing incinerators configured in parallel, respectively identified as OXD#1 and OXD#2, with each incinerator exhausting through one (1) stack (S/V ID: S-OXD1 and S-OXD2), respectively.
- (2) one (1) nine (9) station packaging rotogravure printing press identified as Press #2 (nine stations: P2U1 through P2U9), constructed in April of 1991, with a maximum line speed of 840 feet per minute (ft/min) when printing with ink and 740 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system with a total heat input rate of 7.76 million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) emissions from P2U1-P2U9 are controlled by one of the following:
 - (a) a single catalytic oxidizing incinerator identified as OXD#2 exhausting through one (1) stack (S/V ID: S-OXD2); or
 - (b) a single catalytic oxidizing incinerator identified as OXD #5 exhausting through one (1) stack (S/V ID: S-OXD5); or
 - (c) two (2) catalytic oxidizing incinerators configured in parallel, respectively identified as OXD#2 and OXD#5, with each incinerator exhausting through one (1) stack (S/V ID: S-OXD2 and S-OXD5), respectively.
- (3) one (1) eight (8) station packaging rotogravure printing press identified as Press #3 (eight stations: P3U1 through P3U8), constructed in April of 1997, with a maximum line speed of 800 ft/min when printing with ink and 700 ft/min when printing with ink and adhesive. The volatile organic compound (VOC) emissions from P3U1-P3U8 are controlled by one catalytic oxidizing incinerator identified as OXD#5 exhausting through one (1) stack (S/V ID: S-OXD5).
- (4) one (1) eight (8) station packaging rotogravure printing press identified as Press #4 (eight stations: P4U1 through P4U8), constructed in January of 1997, with a maximum line speed of 800 feet per minute (ft/min) when printing with ink and 700 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system with a total heat input rate of twelve (12) million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) emissions from P4U1-P4U8 are controlled by one of the following:
 - (a) a single catalytic oxidizing incinerator identified as OXD#3 exhausting through one (1) stack (S/V ID: S-OXD3); or
 - (b) a single thermal oxidizing incinerator identified as OXD#4 exhausting through one (1) stack (S/V ID: S-OXD4); or
 - (c) catalytic and thermal oxidizing incinerators configured in parallel, respectively identified

as OXD#3 and OXD#4, with each incinerator exhausting through one (1) stack (S/V ID: S-OXD3 and S-OXD4), respectively.
(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.8.1 Graphic Arts Operations [326 IAC 8-5-5] [326 IAC 8-1-12]

- (a) Pursuant to 326 IAC 8-5-5(c)(3)(B) (Graphic Arts Operations), the Permittee may not cause, allow, or permit the operation of the facility unless the Permittee installs and operates an incineration system(s) that oxidizes at least ninety percent (90%) of the nonmethane volatile organic compounds (volatile organic compounds measured as total combustible carbon) to carbon dioxide and water.
- (b) A capture system must be used in conjunction with each emission control system. The capture system shall attain an efficiency sufficient to achieve an overall control efficiency, in conjunction with the emission control system, of sixty-five percent (65%) for packaging rotogravure processes.
- (c) Pursuant to 326 IAC 8-5-5(c)(3)(B), the following shall apply:
 - (1) The catalytic oxidizing incinerator identified as OXD #1 shall maintain a minimum operating temperature of 650°F or a temperature determined in the most recent compliance tests (described in Condition D.8.8) to maintain a minimum 90% destruction of the nonmethane VOC captured.
 - (2) The catalytic oxidizing incinerators identified as OXD#2, and OXD #3 shall each maintain a minimum operating temperature of 600°F or a temperature determined in the most recent compliance tests (described in Condition D.8.8) to maintain a minimum 90% destruction of the nonmethane VOC captured.
 - (3) The thermal oxidizing incinerator identified as OXD #4 shall maintain a minimum operating temperature of 1,500°F or a temperature determined in the most recent compliance tests (described in Condition D.8.8) to maintain a minimum 90% destruction of the nonmethane VOC captured.
 - (4) The catalytic oxidizing incinerator identified as OXD #5 shall maintain a minimum operating temperature of 600°F or at least a temperature determined in the most recent compliance tests (described in Condition D.8.8) to maintain a minimum 90% destruction of the nonmethane VOC captured.
- (d) Pursuant to 326 IAC 8-1-12 (Compliance Certification, Record Keeping and Reporting Requirements for Certain Coating Facilities Using Control Devices), this facility is subject to the following requirements when utilizing a thermal and/or catalytic oxidizer to comply with 326 IAC 8-5-5(c)(3)(B):
 - (1) Each incineration control system shall be operated and maintained according to the manufacturer's recommendations but may be modified based on the results of the initial or subsequent compliance test or upon the written request of IDEM,

OAQ.

- (2) A copy of the operating and maintenance procedures shall be maintained in a convenient location at the source property and as close to each control system as possible for reference by plant personnel and IDEM, OAQ inspectors.

D.8.2 General Provisions Relating to HAPs [326 IAC 20-1-1] [40 CFR Part 63, Subpart A] [326 IAC 2-4.1]

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section, as specified in Table 1 of 40 CFR 63, Subpart KK.

D.8.3 Printing and Publishing Industry NESHAP [326 IAC 20-18-1] [40 CFR Part 63, Subpart KK] [326 IAC 2-4.1]

This facility is subject to 40 CFR 63, Subpart KK, which is incorporated by reference as 326 IAC 20-18-1. A copy of this rule is attached. The Permittee shall comply with all applicable provisions of this rule on and after May 30, 1999.

- (a) The four (4) packaging rotogravure printing presses (P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U8) shall limit emissions to no more than twenty (20) percent of the mass of solids applied for the month.
- (b) Pursuant to 40 CFR 63.825(b)(8), to demonstrate compliance with this standard, the Permittee shall, for each press, operate a capture system and control device and limit the organic HAP emission rate to no more than 0.20 kg organic HAP emitted per kg solids applied as determined on a monthly average as-applied basis. The Permittee shall demonstrate compliance in accordance with the following provisions of 40 CFR 63.825(d):
- (1) The Permittee shall demonstrate compliance through performance tests of capture efficiency and control device efficiency following the procedures in Condition D.8.9(a); and
- (2) The Permittee shall demonstrate continuing compliance through continuous monitoring of capture system and control device operating parameters following the procedures in Condition D.8.14.
- (c) The Permittee shall determine the solids content and organic HAP content of each ink, coating, varnish, adhesive, primer, solvent, and other material applied during the month following the procedure in 40 CFR 63.827(c)(2) and Condition D.8.9(c) and (d).
- (d) The Permittee shall determine the organic HAP emissions for the affected source for the month by summing all organic HAP emissions calculated according to Condition D.8.9(b). The source is in compliance for the month if:
- (1) All operating parameters required to be monitored under Condition D.8.14 were maintained at the appropriate values; and
- (2) The total mass of organic HAP emitted by the source was not more than twenty percent of the total mass of solids applied by the source.

D.8.4 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

The source-wide potential to emit VOC is limited to less than 250 tons per year to be a minor

source under 326 IAC 2-2 (PSD) and 40 CFR 52.21. The total input VOC, including coatings, dilution solvents, and cleaning solvents, to Presses #1 through #4 (emission units P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U8) shall be limited to 3,458 tons per twelve (12) consecutive month period. VOC emissions from each press shall be controlled by a capture and incineration system that achieves a minimum overall VOC control efficiency of 94%. This usage limitation will then be equivalent to a VOC emission limitation of 207.5 tons per year.

The above emission limits including VOC limits from Alternative Operating Scenarios 1 through 7 and 9 through 10 and VOC emissions from natural gas combustion, solvent degreasing and the insignificant activities will limit source-wide VOC emissions to less than 250 tons per year.

D.8.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and the control devices.

D.8.6 Startup, Shutdown, and Malfunction Plan [40 CFR 63.6(e)(3) General Provisions] [326 IAC 20-1-1] [326 IAC 2-4.1]

Pursuant to the Printing and Publishing Industry NESHAP, the Permittee shall develop and implement a written startup, shutdown, and malfunction (SSM) plan that describes, in detail, procedures for operating and maintaining the facility during periods of startup, shutdown, and malfunction and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with 40 CFR 63, Subpart KK. As required under 40 CFR 63.8(c)(1)(i) (General Provisions), the plan shall identify all routine or otherwise predictable continuous monitoring system (CMS) malfunctions. This plan shall have been developed by the Permittee by the facility's compliance date, May 30, 1999. The plan shall be incorporated by reference into the source's Part 70 permit.

- (a) The purpose of the SSM plan is to –
 - (1) Ensure that, at all times, the Permittee operates and maintains the facility, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions at least to the level required by the rule;
 - (2) Ensure that the Permittee is prepared to correct malfunctions as soon as practicable after their occurrence in order to minimize excess emissions of HAP; and
 - (3) Reduce the reporting burden associated with periods of startup, shutdown, and malfunction (including corrective action taken to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation).
- (b) During periods of startup, shutdown, and malfunction, the Permittee shall operate and maintain the facility (including associated air pollution control equipment) in accordance with the procedures specified in the SSM plan developed under this condition.
- (c) Record keeping associated with the SSM plan is identified in Condition D.8.17. Reporting associated with the SSM plan is identified in Condition D.8.22.
- (d) The Permittee shall keep the written SSM plan on record after it is developed to be made

available for inspection, upon request, by IDEM, OAQ for the life of the facility or until the facility is no longer subject to this rule. In addition, if the SSM plan is revised, the Permittee shall keep previous (i.e., superseded) versions of the SSM plan on record, to be made available for inspection, upon request, by IDEM, OAQ, for a period of 5 years after each revision to the plan. Revisions to the SSM plan are automatically incorporated by reference and do not require a permit revision.

- (e) To satisfy the requirements of this condition, the Permittee may use the facility's standard operating procedures (SOP) manual, or an Occupational Safety and Health Administration (OSHA) or other plan, provided the alternative plans meet all the requirements of this condition and are made available for inspection when requested by IDEM, OAQ.
- (f) IDEM, OAQ shall determine whether acceptable operation and maintenance procedures are being used, based on information available to IDEM, OAQ, which may include, but is not limited to, monitoring results, review of operation and maintenance procedures (including the SSM plan required in this condition), review of operation and maintenance records, and inspection of the facility.

Based on the results of such determination, IDEM, OAQ may require that the Permittee make changes to the SSM plan for the facility. IDEM, OAQ may require reasonable revisions to a SSM plan, if IDEM, OAQ finds that the plan:

- (1) Does not address a startup, shutdown, or malfunction event that has occurred;
 - (2) Fails to provide for the operation of the facility (including associated air pollution control equipment) during a startup, shutdown, or malfunction event in a manner consistent with good air pollution control practices for minimizing emissions at least to the levels required by all relevant standards; or
 - (3) Does not provide adequate procedures for correcting malfunctioning process and/or air pollution control equipment as quickly as practicable.
- (g) If the SSM plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction but was not included in the SSM plan at the time the Permittee developed the plan, the Permittee shall revise the SSM plan within forty-five (45) days after the event to include detailed procedures for operating and maintaining the facility during similar malfunction events and a program of corrective action for similar malfunctions of process or air pollution control equipment.

D.8.7 Enforcement Action [Agreed Order A-3820]

The Permittee shall comply with Agreed Order #A-3820, effective November 30, 1998. The Agreed Order is effective for a period of four (4) years from the Effective Date of the Agreed Order.

Compliance Determination Requirements

D.8.8 Testing Requirements [326 IAC 8-1-12]

Pursuant to 326 IAC 8-5-5(c)(3)(B) and 326 IAC 8-1-12, each incineration control system shall be tested according to the following schedule and in the following situations:

- (a) An initial compliance test shall be conducted. Compliance tests shall be conducted no later than every thirty (30) months after the date of the initial test.

- (b) A compliance test shall be conducted whenever the Permittee chooses to operate a control system under conditions different from those that were in place at the time of the previous test.
- (c) A compliance test shall be performed within ninety (90) days of:
 - (1) Startup of a new coating facility;
 - (2) Changing the method of compliance for an existing coating facility from compliant coatings or daily-weighted averaging to control devices; or
 - (3) Receipt of a written request from IDEM, OAQ or the U.S. EPA.
- (d) All compliance tests shall be conducted according to a protocol approved by IDEM, OAQ at least thirty (30) days before the test. The protocol shall contain, at a minimum, the following information:
 - (1) Test procedures;
 - (2) Operating and control system parameters;
 - (3) Type of VOC containing process material being used; and
 - (4) The process and control system parameters that will be monitored during the test.

D.8.9 Testing Requirements [40 CFR Part 63, Subpart KK] [326 IAC 20-18-1] [326 IAC 2-4.1]

Pursuant to the Printing and Publishing Industry NESHAP, the Permittee shall comply with the following requirements:

- (a) Pursuant to 40 CFR 63.825(d)(1), the Permittee shall demonstrate initial compliance through performance tests of capture efficiency and control device efficiency and continuing compliance through continuous monitoring of capture system and control device operating parameters following the procedures outlined below.
 - (1) Determine the oxidizer destruction efficiency (E) for each of the control devices using the following procedure pursuant to 40 CFR 63.827(d):
 - (A) An initial performance test to establish the destruction efficiency and the associated combustion zone temperature for each thermal oxidizer and the associated catalyst bed inlet temperature for each catalytic oxidizer shall be conducted and the data reduced in accordance with the following reference methods and procedures:
 - (i) Method 1 or 1A of 40 CFR 60, Appendix A is used for sample and velocity traverses to determine sampling locations.
 - (ii) Method 2, 2A, 2C, or 2D of 40 CFR 60, Appendix A is used to determine gas volumetric flow rate.
 - (iii) Method 3 of 40 CFR 60, Appendix A is used for gas analysis to determine dry molecular weight.

- (iv) Method 4 of 40 CFR 60, Appendix A is used to determine stack gas moisture.
- (v) Methods 2, 2A, 3, and 4 of 40 CFR 60, Appendix A shall be performed, as applicable, at least twice during each test period.
- (vi) Method 25 of 40 CFR 60, Appendix A, shall be used to determine organic volatile matter concentration, except as provided in (a) through (c) below. The Permittee shall submit notice of the intended test method to IDEM, OAQ for approval along with notice of the performance test required under 40 CFR 63.7(c) (General Provisions). The Permittee may use Method 25A of 40 CFR 60, Appendix A, if:
 - (a) An exhaust gas organic volatile matter concentration of 50 parts per million by volume (ppmv) or less is required to comply with Condition D.1.3; or
 - (b) The organic volatile matter concentration at the inlet to the control system and the required level of control are such to result in exhaust gas organic volatile matter concentrations of 50 ppmv or less; or
 - (c) Because of the high efficiency of the control device, the anticipated organic volatile matter concentration at the control device exhaust is 50 ppmv or less, regardless of inlet concentration.
- (vii) Each performance test shall consist of three separate runs; each run conducted for at least one hour under the conditions that exist when the affected source is operating under normal operating conditions. For the purpose of determining organic volatile matter concentrations and mass flow rates, the average of results of all runs shall apply.
- (viii) Organic volatile matter mass flow rates shall be determined using the following equation:

$$M_f = Q_{sd} \sum_{i=1}^n C_i M W_i [0.0416] [10^{-6}]$$

where the symbols of this equation are defined in 40 CFR 63.822 (Definitions).

- (ix) Emission control device efficiency shall be determined using the following equation:

$$E = [M_{fi} - M_{fo}] / M_{fi}$$

where the symbols of this equation are defined in 40 CFR 63.822

(Definitions).

- (B) The Permittee shall record such process information as may be necessary to determine the conditions of the performance test. Operations during periods of start-up, shutdown, and malfunction shall not constitute representative conditions for the purpose of a performance test.
- (C) For the purpose of determining the value of the oxidizer operating parameter that will demonstrate continuing compliance, the time-weighted average of the values recorded during the performance test shall be computed. For each thermal oxidizer, the Permittee shall establish as the operating parameter the minimum combustion temperature. For each catalytic oxidizer, the Permittee shall establish as the operating parameter the minimum gas temperature upstream of the catalyst bed. These minimum temperatures are the operating parameter values that demonstrate continuing compliance with the requirements of Condition D.8.3.
- (2) Pursuant to 40 CFR 63.827(e)(1), determine the capture system capture efficiency (F) of each capture system venting organic emissions to a control device for the purposes of meeting the requirements of Condition D.8.3 by conducting a performance test in accordance with Procedure T – Criteria for and Verification of a Permanent or Temporary Total Enclosure as found in 40 CFR 52.741, Appendix B to confirm that an enclosure meets the requirements for permanent total enclosure. For permanent total enclosures, capture efficiency shall be assumed as 100 percent.
- (3) Calculate the overall organic HAP control efficiency, (R), achieved by each control device and capture system using the following equation:
- $$R = EF / 100$$
- where E and F are determined according to paragraphs (a)(1) and (2) of this condition.
- (4) Based on stack tests conducted in November and December of 1999 and June of 2000, the Permittee shall operate the oxidizers at all times the presses are in operation, maintain the 100 percent capture efficiencies, and demonstrate continuous compliance in accordance with the following:
- (A) The catalytic oxidizing incinerator identified as OXD#1 shall maintain a minimum operating temperature of 650°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain compliance with Conditions D.8.3, and D.8.9(d).
- (B) The catalytic oxidizing incinerators identified as OXD#2 and OXD#3 shall each maintain a minimum operating temperature of 600°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain compliance with Conditions D.8.3, and D.8.9(d).
- (C) The thermal oxidizing incinerator identified as OXD#4 shall maintain a

minimum operating temperature of 1,500°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain compliance with Conditions D.8.3, and D.8.9(d).

- (D) The catalytic oxidizing incinerator identified as OXD#5 shall maintain a minimum operating temperature of 600°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain compliance with Conditions D.8.3, and D.8.9(d).
- (b) Pursuant to 40 CFR 63.825(g), the Permittee shall determine the mass of organic HAP emitted using the following procedure:
- (1) Determine the sum of the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on intermittently-controllable work stations in bypass mode and the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on never-controlled work stations during the month, M_{Bi} .
 - (2) Determine the sum of the mass of all solvents, reducers, thinners, and other diluents which are applied on intermittently-controllable work stations in bypass mode and the mass of all solvents, reducers, thinners, and other diluents which are applied on never-controlled work stations during the month, M_{Bj} .
 - (3) Determine the sum of the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on intermittently-controllable work stations in controlled mode and the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on always-controlled work stations during the month, M_{Ci} .
 - (4) Determine the sum of the mass of all solvents, reducers, thinners, and other diluents which are applied on intermittently-controllable work stations in controlled mode and the mass of all solvents, reducers, thinners, and other diluents which are applied on always-controlled work stations during the month, M_{Cj} .
 - (5) Calculate the organic HAP emitted during the month using the following equation:

$$H = \left[\sum_{i=1}^p M_{Ci} C_{hi} + \sum_{j=1}^q M_{Cj} C_{hj} \right] * \left[1 - \left(\frac{E}{100} * \frac{F}{100} \right) \right] + \left[\sum_{i=1}^p M_{Bi} C_{hi} + \sum_{j=1}^q M_{Bj} C_{hj} \right]$$

where the symbols of this equation are defined in 40 CFR 63.822 (Definitions).

- (c) Pursuant to 40 CFR 63.827(c)(2), the Permittee shall determine the volatile matter and solids content of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers, diluents, and other materials applied by following the procedure below.
- (1) The Permittee shall determine the volatile matter and solids weight-fraction of each ink, coating, varnish, adhesive, primer, solvent, reducer, thinner, diluent, and other material applied using Method 24 of 40 CFR part 60, appendix A. The Method 24

determination may be performed by the manufacturer of the material and the results provided to the Permittee.

- (2) If these values cannot be determined using Method 24, the Permittee shall submit an alternative technique for determining their values for approval by the Administrator.
- (3) The Permittee may rely on formulation data, subject to the following, in accordance with the provisions of 40 CFR 63.827(c)(3):
 - (A) The Permittee may determine the volatile matter content of materials based on formulation data, and may rely on volatile matter content data provided by material suppliers; and
 - (B) In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR part 60, appendix A, the applicable test method shall govern, unless after consultation, the Permittee can demonstrate to the satisfaction of the enforcement agency that the formulation data are correct.
- (d) Pursuant to 40 CFR 63.825(d)(1)(xi), the Permittee is in compliance if the oxidizers are operated such that the average combustion temperature or average temperature upstream of the catalyst bed is greater than the operating parameter established in accordance with 40 CFR 63.828(a)(4) and condition D.8.9 for each three-hour period, and the organic HAP emission rate based on solids applied, L, is 0.20 kg organic HAP per kg solids applied or less.

D.8.10 Testing Requirements [Agreed Order A-3820]

Pursuant to Agreed Order A-3820, effective November 30, 1998, the Permittee shall conduct annual VOC testing at Presses Nos. 1, 2, 3, and 4 to demonstrate compliance with 326 IAC 8-5-5 and applicable permit conditions. This testing shall be conducted in accordance with the requirements of 326 IAC 3-6, Source Sampling Procedures. The Permittee shall conduct the first of these tests within the fourth quarter of 1999. Subsequent tests shall be conducted during the fourth quarter of each consecutive year. This requirement shall cease after the tests conducted in the fourth quarter 2000 provided that the Permittee demonstrated complete compliance with 326 IAC 8-5-5 and applicable permit conditions during both the 1999 and 2000 tests. The performance of annual VOC testing under this Order shall otherwise satisfy any similar VOC testing requirements imposed on the Permittee under its air permits for the period of the Agreed Order.

D.8.11 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.8.1 and D.8.4 shall be determined pursuant to 326 IAC 8-1-2(a) and 326 IAC 8-1-4(a)(3) using formulation data supplied by the coating manufacturer.

D.8.12 VOC Emissions

Compliance with Condition D.8.4 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the twelve (12) month period.

D.8.13 Volatile Organic Compounds (VOC) Control

- (a) The catalytic and thermal oxidizers controlling VOC emissions from Presses #1 through #4 (emission units P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1

through P4U8) shall be in operation at all times that these units are in operation to ensure compliance with condition D.8.4.

- (b) The catalytic oxidizing incinerator identified as OXD#1 shall maintain a minimum operating temperature of 650°F during operation or a temperature that has been determined from the most recent compliant stack tests to maintain compliance with condition D.8.4.
- (c) The catalytic oxidizing incinerators identified as OXD#2, and OXD#3 shall each maintain a minimum operating temperature of 600°F during operation or a temperature that has been determined from the most recent compliant stack tests to maintain compliance with condition D.8.4.
- (d) The thermal oxidizing incinerator identified as OXD #4 shall maintain a minimum operating temperature of 1,500°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain compliance with condition D.8.4.
- (e) The catalytic oxidizing incinerator identified as OXD #5 shall maintain a minimum operating temperature of 600°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain compliance with condition D.8.4.

Note: The use of the oxidizers to control VOC emissions from Presses #1 through #4 to comply with the PSD minor VOC emission limitation was voluntarily proposed by the source. Therefore, the source may apply for a modification to remove the requirement to operate the oxidizers at all times that any of the presses are in operation under this Alternative Operating Scenario at any time if compliance with the PSD minor VOC emission limit can be achieved by other means.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.8.14 Monitoring Requirements [326 IAC 8-1-12]

Pursuant to 326 IAC 8-5-5(c)(3)(B) and 326 IAC 8-1-12, the monitoring equipment requirements shall be as follows:

- (a) When the thermal incinerator is used for VOC reduction, a temperature monitoring device capable of continuously recording the temperature of the gas stream in the combustion zone of the incinerator shall be used. The temperature monitoring device shall have an accuracy of one percent (1%) of the temperature being measured in degrees Centigrade, or plus or minus five-tenths degree Centigrade ($\pm 0.5^{\circ}\text{C}$), whichever is more accurate; and
- (b) When a catalytic incinerator is used for VOC reduction, a temperature device capable of continuously recording the temperature in the gas stream immediately before and after the catalyst bed of each incinerator shall be used. The temperature monitoring device shall have an accuracy of one percent (1%) of the temperature being measured in degrees Centigrade, or plus or minus five-tenths degree Centigrade ($\pm 0.5^{\circ}\text{C}$), whichever is more accurate.

D.8.15 Monitoring Requirements [40 CFR 63.828] [326 IAC 20-18-1] [326 IAC 2-4.1]

Pursuant to the Printing and Publishing Industry NESHAP, following the date on which the initial

performance test of a control device is completed, to demonstrate continuing compliance with the standard, the Permittee shall monitor and inspect each control device required to comply with Condition D.8.3 to ensure proper operation and maintenance by implementing the following requirements:

- (a) The Permittee shall, for each dryer associated with an intermittently-controllable work station, secure any bypass line valve in the closed position with a car-seal or a lock-and-key type configuration. A visual inspection of the seal or closure mechanism shall be performed at least once every month to ensure that the valve or damper is maintained in the closed position and the exhaust stream is not diverted through the bypass line.
- (b) For the thermal oxidizer, the Permittee shall install, calibrate, operate, and maintain a temperature monitoring device equipped with a continuous recorder. The device shall have an accuracy of ± 1 percent of the temperature being monitored in $^{\circ}\text{C}$ or $\pm 1^{\circ}\text{C}$, whichever is greater. The thermocouple or temperature sensor shall be installed in the combustion chamber at a location in the combustion zone.
- (c) For each catalytic oxidizer, the Permittee shall install, calibrate, operate, and maintain a temperature monitoring device equipped with a continuous recorder. The device shall be capable of monitoring temperature with an accuracy of ± 1 percent of the temperature being monitored in $^{\circ}\text{C}$ or $\pm 1^{\circ}\text{C}$, whichever is greater. The thermocouple or temperature sensor shall be installed in the vent stream at the nearest feasible point to the catalyst bed inlet.
- (d) All temperature monitoring equipment shall be installed, calibrated, maintained, and operated according to manufacturers' specifications. The calibration of the chart recorder, data logger, or temperature indicator shall be verified every three months; or the chart recorder, data logger, or temperature indicator shall be replaced. The replacement shall be done either if the Permittee chooses not to perform the calibration, or if the equipment cannot be calibrated properly.
- (e) Any excursion from the required operating parameters which are monitored in accordance with this condition and Condition D.8.9(c)(4) and (d), unless otherwise excused, shall be considered a violation of Condition D.8.3.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.8.16 Contemporaneous Log for Alternate Operating Scenarios [326 IAC 2-7-5(9)]

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- (a) Pursuant to 326 IAC 2-7-5(9)(A), contemporaneously with making a change from one alternative operating scenario to another, the Permittee shall make a record in a log at the permitted facility of the scenario under which it is operating. The record should state the alternative operating scenario for each station, since different stations at the same press may be operating under different scenarios.
 - (b) The records required in paragraph (a) of this condition shall be maintained in accordance with the requirements of Condition C.20 and 326 IAC 8-1-9(c).

D.8.17 Record Keeping Requirements [326 IAC 8-1-12]

- (a) Pursuant to 326 IAC 8-1-12(c), upon changing the method of compliance for an existing coating facility from the use of compliant coatings (326 IAC 8-5-5(c)(1), (2), or (4)) to control devices (326 IAC 8-5-5(c)(3)(B)), the Permittee shall collect and record each day and maintain all of the following information for each coating facility:
- (1) The name and identification of each coating used at each coating facility.
 - (2) The mass of VOC per unit volume of coating solids, as applied, the volume solids content, as applied, and the volume, as applied, of each coating expressed in units necessary to determine compliance, used each day at each coating facility.
 - (3) The maximum VOC content (mass of VOC per unit volume of coating solids, as applied) or the daily weighted average VOC content (mass of VOC per unit volume of coating solids, as applied) of the coatings used each day on each coating facility.
 - (4) The required overall emission reduction efficiency for each day for each coating facility.
 - (5) The actual overall emission reduction efficiency achieved for each day for each coating facility as determined during the compliance test required by Condition D.8.8 pursuant to 326 IAC 8-1-12(b)(1)(C).
 - (6) Control device monitoring data as follows:
 - (A) For the thermal incinerator, the following:
 - (i) Continuous records of the temperature in the gas stream in the combustion zone of the incinerator; and
 - (ii) Records of all three (3) hour periods of operation in which the average combustion temperature of the gas stream in the combustion zone was more than fifty degrees Fahrenheit (50°F) (twenty-eight degrees Centigrade (28°C)) below the average combustion temperature that existed during the most recent test that demonstrated that the coating facility was in compliance.
 - (B) For each catalytic incinerator, the following:
 - (i) Continuous records of the temperature of the gas stream both upstream and downstream of the catalyst bed of the incinerator;
 - (ii) Records of all three (3) hour periods of operation in which the average temperature measured at the process vent stream immediately before the catalyst bed is more than fifty degrees Fahrenheit (50°F) (twenty-eight degrees Centigrade (28°C)) below the average temperature of the process vent stream that existed during the most recent test that demonstrated that the coating facility was in compliance; and

- (iii) Records of all three (3) hour periods of operation in which the average temperature difference across the catalyst bed is less than eighty percent (80%) of the temperature difference measured during the most recent test that demonstrated that the coating facility was in compliance.
- (7) A log of operating time for each capture system, control device, monitoring equipment, and the associated coating facility.
- (8) A maintenance log for each capture system, control device, and monitoring equipment detailing all routine and nonroutine maintenance performed including dates and duration of any outages.
- (b) The records required in paragraph (a) of this condition shall be maintained in accordance with the requirements of Condition C.20 and 326 IAC 8-1-9(c).

D.8.18 Record Keeping Requirements [40 CFR 63.829] [326 IAC 20-18-1] [326 IAC 2-4.1]

- (a) Pursuant to the Printing and Publishing Industry NESHAP, the Permittee shall maintain the following records on a monthly basis:
 - (1) Records of all measurements needed to demonstrate compliance with Conditions D.8.3 and D.8.6. These records shall include at a minimum the following specified in 40 CFR 63.10(b)(2) (General Provisions) that are applicable:
 - (A) The occurrence and duration of each startup, shutdown, or malfunction of operation (i.e., process equipment);
 - (B) The occurrence and duration of each malfunction of the air pollution control equipment;
 - (C) All maintenance performed on the air pollution control equipment;
 - (D) Actions taken during periods of startup, shutdown, and malfunction (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation) when such actions are different from the procedures specified in the SSM plan required by Condition D.8.6;
 - (E) All information necessary to demonstrate conformance with the SSM plan required in Condition D.8.6 when all actions taken during periods of startup, shutdown, and malfunction (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation) are consistent with the procedures specified in such plan (The information needed to demonstrate conformance with the SSM plan may be recorded using a "checklist", or some other effective form or record keeping, in order to minimize the record keeping burden for conforming events);
 - (F) Each period during which a continuous monitoring system (CMS) is malfunctioning or inoperative (including out-of-control periods);

- (G) All required measurements needed to demonstrate compliance with Condition D.8.3 (including, but not limited to, 15-minute averages of CMS data, raw performance testing measurements, raw performance evaluation measurements, and control device and capture system operating parameter data, that support data that the source is required to report);
 - (H) All results of performance tests and CMS performance evaluations;
 - (I) All measurements as may be necessary to determine the conditions of performance tests and performance evaluations;
 - (J) All CMS calibration checks;
 - (K) All adjustments and maintenance performed on CMS; and
 - (L) All documentation supporting initial notifications of compliance status under 40 CFR 63.9 (General Provisions).
- (2) Records for each CMS operated by the Permittee in accordance with the requirements of Condition D.8.14. These records are in addition to complying with the requirements specified in paragraph (a)(1) of this condition, and shall include at a minimum the following specified in 40 CFR 63.10(c) (General Provisions) that are applicable:
- (A) All required CMS measurements (including monitoring data recorded during unavoidable CMS breakdowns and out-of-control periods);
 - (B) The date and time identifying each period during which the CMS was inoperative except for zero (low-level) and high-level checks;
 - (C) The date and time identifying each period during which the CMS was out of control, as defined in 40 CFR 63.8(c)(7) (General Provisions);
 - (D) The specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions and parameter monitoring exceedances, as defined in the rule, that occurs during startups, shutdowns, and malfunctions of the facility;
 - (E) The specific identification (i.e., the date and time of commencement and completion) of each time period of excess emissions and parameter monitoring exceedances, as defined in the rule, that occurs during periods other than startups, shutdowns, and malfunctions of the facility;
 - (F) The nature and cause of any malfunction (if known);
 - (G) The corrective action taken or preventive measures adopted;
 - (H) The nature of the repairs or adjustments to the CMS that was inoperative or out of control;
 - (I) The total process operating time during the reporting period; and

- (J) All procedures that are part of a quality control program developed and implemented for CMS under 40 CFR 63.8(d) (General Provisions).

In order to satisfy the requirements of paragraphs (F) through (H) of this condition and to avoid duplicative record keeping efforts, the Permittee may use the SSM plan or records kept to satisfy the record keeping requirements of the SSM plan specified in Condition D.8.6, provided that such plan and records adequately address the requirements of paragraphs (F) through (H) of this condition.

- (b) The records required in paragraph (a) of this condition shall be maintained in accordance with the following requirements of 40 CFR 63.10(b)(1) (General Provisions):
- (1) The Permittee shall maintain files of all information (including all reports and notifications) required by this rule recorded in a form suitable and readily available for expeditious inspection and review.
 - (2) The files shall be retained for at least five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent two years of data shall be retained on site. The remaining three years of data may be retained off site.
 - (3) Such files may be maintained on microfilm, on a computer, on computer floppy disks, on magnetic tape disks, or on microfiche.

D.8.19 Record Keeping Requirements

- (a) To document compliance with Condition D.8.4, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limit and/or the VOC emission limit established in Condition D.8.4.
- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;
 - (2) A log of the dates of use;
 - (3) The total VOC usage for each month at each press while operating the incinerators;
 - (4) The weight of VOCs emitted for each compliance period for each press; and
 - (5) The continuous temperature records for the catalytic and thermal incinerators and the temperature used to demonstrate compliance during the most recent compliance stack test.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.8.20 Record Keeping Requirements [Agreed Order A-3820]

Pursuant to Agreed Order #A-3820, effective November 30, 1998, for a period of four (4) years, the

Permittee shall maintain, and provide upon request, a record of all times that an incinerator is overloaded or shuts down and results in the triggering of the automatic press shut-off. This record should include the dates, times, and the presses and incinerators involved in each of these incidents.

D.8.21 Reporting Requirements [326 IAC 8-1-12]

Pursuant to 326 IAC 8-5-5(c)(3)(B) and 326 IAC 8-1-12, the Permittee shall notify IDEM, OAQ in either of the following instances:

- (a) Any record showing noncompliance with the applicable requirements for control devices shall be reported by submitting a copy of the record to IDEM, OAQ within thirty (30) days following noncompliance; such record shall also be submitted with the quarterly compliance monitoring report attached to this permit. The following information shall accompany each submittal:
 - (1) Name and location of the coating facility;
 - (2) Identification of the control system where the noncompliance occurred and the coating facility it served;
 - (3) Time, date and duration of the noncompliance; and
 - (4) Corrective action taken.
- (b) At least thirty (30) calendar days before changing the method of compliance from control devices (326 IAC 8-5-5(c)(3)(B)) to the use of compliant coatings (326 IAC 8-5-5(c)(1), (2), or (4)), the Permittee shall comply with all applicable requirements of 326 IAC 8-1-10(b). Upon changing the method of compliance from control devices to the use of compliant coatings, the Permittee shall comply with all requirements of 326 IAC 8-1-10(b), applicable to the coating facility subject to 326 IAC 8-5-5.

D.8.22 Reporting Requirements

- (a) A quarterly summary of the information to document compliance with Condition D.8.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. This quarterly summary report can be submitted in the same summary report required for Alternative Operating Scenarios 1 through 7 and 9 through 10 in Conditions D.1.17(a), D.2.17(a), D.3.17(a), D.4.17(a), D.5.17(a), D.6.17(a), D.7.21(a), D.9.21(a), and D.10.21(a). The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) Pursuant to 326 IAC 2-7-5(9)(C), the Permittee shall include a summary of the records required under Condition D.8.15 in the annual compliance certification submitted under 326 IAC 2-7-6(5) and Condition B.11.

D.8.23 Reporting Requirements [40CFR 63.830] [326 IAC 20-18-1] [326 IAC 2-4.1]

Pursuant to the Printing and Publishing Industry NESHAP, the Permittee shall submit the reports and plans listed below to the following addresses:

Indiana Department of Environmental Management

Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (a) A Notification of Performance Tests specified in 40 CFR 63.7 and 63.9(e) (General Provisions). This notification, and the site-specific test plan required under 40 CFR 63.7(c)(2) (General Provisions) shall identify the operating parameter to be monitored to ensure that the capture efficiency measured during the performance test is maintained. The operating parameter identified in the site-specific test plan shall be considered to be approved unless explicitly disapproved, or unless comments received from IDEM, OAQ require monitoring of an alternate parameter.
- (b) A Notification of Compliance Status specified in 40 CFR 63.9(h) (General Provisions). This notification can be submitted in the same notification required for Alternative Operating Scenarios 1 through 7 and 9 through 10 in Conditions D.1.18(a), D.2.18(a), D.3.18(a), D.4.18(a), D.5.18(a), D.6.18(a), D.7.22(b), D.9.22(b), and D.10.22(b).
- (c) Performance test reports specified in 40 CFR 63.10(d)(2) (General Provisions).
- (d) Start-up, shutdown and malfunction (SSM) reports specified in 40 CFR 63.10(d)(5) (General Provisions).
 - (1) If actions taken by the Permittee during a start-up, shutdown, or malfunction of the facility (including actions taken to correct a malfunction) are not completely consistent with the procedures specified in the facility's SSM plan specified in Condition D.8.6, the Permittee shall report the actions taken for that event in strict accordance with 40 CFR 63.10(d)(5)(ii), i.e., within two (2) working days after commencing actions inconsistent with the plan, followed by a letter within seven (7) working days after the end of the event. The SSM report shall consist of a letter containing the name, title, and signature of the responsible official who is certifying its accuracy; shall be submitted to IDEM, OAQ; and shall otherwise comply with the provisions of 40 CFR 63.10(d)(5)(ii).
 - (2) Separate start-up, shutdown, or malfunction reports are not required if the information is included in the report specified in paragraph (e) of this condition.
- (e) A summary report specified in 40 CFR 63.10(e)(3) (General Provisions) shall be submitted on a semi-annual basis (i.e., once every six-month period). In addition to a report of operating parameter exceedances as required by 40 CFR 63.10(e)(3)(i) (General Provisions), the summary report shall include exceedances of the standards in Condition D.8.3. This summary report can be submitted in the same summary report required for Alternative Operating Scenarios 1 through 7 and 9 through 10 in Conditions D.1.18(b), D.2.18(b), D.3.18(b), D.4.18(b), D.5.18(b), D.6.18(b), D.7.22(e), D.9.22(e), and D.10.22(e).

SECTION D.9 **FACILITY OPERATION CONDITIONS**
Alternative Operating Scenario 9 for Printing Stations Using Solvent-Based Materials

Facility Description [326 IAC 2-7-5(15)] - The following packaging rotogravure printing operations:

- (1) one (1) ten (10) station packaging rotogravure printing press identified as Press #1 (ten stations: P1U1 through P1U10), constructed in May of 1990, with a maximum line speed of 840 feet per minute (ft/min) when printing with ink and 740 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system with a total heat input rate of 7.76 million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) emissions from P1U1-P1U10 are controlled by one of the following:
 - (a) a single catalytic oxidizing incinerator identified as OXD#1 exhausting through one (1) stack (S/V ID: S-OXD1); or
 - (b) a single catalytic oxidizing incinerator identified as OXD#2 exhausting through one (1) stack (S/V ID: S-OXD2); or
 - (c) two (2) catalytic oxidizing incinerators configured in parallel, respectively identified as OXD#1 and OXD#2, with each incinerator exhausting through one (1) stack (S/V ID: S-OXD1 and S-OXD2), respectively.
- (2) one (1) nine (9) station packaging rotogravure printing press identified as Press #2 (nine stations: P2U1 through P2U9), constructed in April of 1991, with a maximum line speed of 840 feet per minute (ft/min) when printing with ink and 740 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system with a total heat input rate of 7.76 million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) emissions from P2U1-P2U9 are controlled by one of the following:
 - (a) a single catalytic oxidizing incinerator identified as OXD#2 exhausting through one (1) stack (S/V ID: S-OXD2); or
 - (b) a single catalytic oxidizing incinerator identified as OXD #5 exhausting through one (1) stack (S/V ID: S-OXD5); or
 - (c) two (2) catalytic oxidizing incinerators configured in parallel, respectively identified as OXD#2 and OXD#5, with each incinerator exhausting through one (1) stack (S/V ID: S-OXD2 and S-OXD5), respectively.
- (3) one (1) eight (8) station packaging rotogravure printing press identified as Press #3 (eight stations: P3U1 through P3U8), constructed in April of 1997, with a maximum line speed of 800 ft/min when printing with ink and 700 ft/min when printing with ink and adhesive. The volatile organic compound (VOC) emissions from P3U1-P3U8 are controlled by one catalytic oxidizing incinerator identified as OXD#5 exhausting through one (1) stack (S/V ID: S-OXD5).
- (4) one (1) eight (8) station packaging rotogravure printing press identified as Press #4 (eight stations: P4U1 through P4U8), constructed in January of 1997, with a maximum line speed of 800 feet per minute (ft/min) when printing with ink and 700 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system with a total heat input rate of twelve (12) million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) emissions from P4U1-P4U8 are controlled by one of the following:
 - (a) a single catalytic oxidizing incinerator identified as OXD#3 exhausting through one (1) stack (S/V ID: S-OXD3); or
 - (b) a single thermal oxidizing incinerator identified as OXD#4 exhausting through one (1) stack (S/V ID: S-OXD4); or
 - (c) catalytic and thermal oxidizing incinerators configured in parallel, respectively identified

as OXD#3 and OXD#4, with each incinerator exhausting through one (1) stack (S/V ID: S-OXD3 and S-OXD4), respectively.
(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.9.1 Graphic Arts Operations [326 IAC 8-5-5] [326 IAC 8-1-12]

- (a) Pursuant to 326 IAC 8-5-5(c)(3)(B) (Graphic Arts Operations), the Permittee may not cause, allow, or permit the operation of the facility unless the Permittee installs and operates an incineration system(s) that oxidizes at least ninety percent (90%) of the nonmethane volatile organic compounds (volatile organic compounds measured as total combustible carbon) to carbon dioxide and water.
- (b) A capture system must be used in conjunction with each emission control system. The capture system shall attain an efficiency sufficient to achieve an overall control efficiency, in conjunction with the emission control system, of sixty-five percent (65%) for packaging rotogravure processes.
- (c) Pursuant to 326 IAC 8-5-5(c)(3)(B), the following shall apply:
 - (1) The catalytic oxidizing incinerator identified as OXD #1 shall maintain a minimum operating temperature of 650°F or a temperature determined in the most recent compliance tests (described in Condition D.9.8) to maintain a minimum 90% destruction of the nonmethane VOC captured.
 - (2) The catalytic oxidizing incinerators identified as OXD#2, and OXD #3 shall each maintain a minimum operating temperature of 600°F or a temperature determined in the most recent compliance tests (described in Condition D.9.8) to maintain a minimum 90% destruction of the nonmethane VOC captured.
 - (3) The thermal oxidizing incinerator identified as OXD #4 shall maintain a minimum operating temperature of 1,500°F or a temperature determined in the most recent compliance tests (described in Condition D.9.8) to maintain a minimum 90% destruction of the nonmethane VOC captured.
 - (4) The catalytic oxidizing incinerator identified as OXD #5 shall maintain a minimum operating temperature of 600°F or at least a temperature determined in the most recent compliance tests (described in Condition D.9.8) to maintain a minimum 90% destruction of the nonmethane VOC captured.
- (d) Pursuant to 326 IAC 8-1-12 (Compliance Certification, Record Keeping and Reporting Requirements for Certain Coating Facilities Using Control Devices), this facility is subject to the following requirements when utilizing a thermal and/or catalytic oxidizer to comply with 326 IAC 8-5-5(c)(3)(B):
 - (1) Each incineration control system shall be operated and maintained according to the manufacturer's recommendations but may be modified based on the results of

the initial or subsequent compliance test or upon the written request of IDEM, OAQ.

- (2) A copy of the operating and maintenance procedures shall be maintained in a convenient location at the source property and as close to each control system as possible for reference by plant personnel and IDEM, OAQ inspectors.

D.9.2 General Provisions Relating to HAPs [326 IAC 20-1-1] [40 CFR Part 63, Subpart A] [326 IAC 2-4.1]

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section, as specified in Table 1 of 40 CFR 63, Subpart KK.

D.9.3 Printing and Publishing Industry NESHAP [326 IAC 20-18-1] [40 CFR Part 63, Subpart KK] [326 IAC 2-4.1]

This facility is subject to 40 CFR 63, Subpart KK, which is incorporated by reference as 326 IAC 20-18-1. A copy of this rule is attached. The Permittee shall comply with all applicable provisions of this rule on and after May 30, 1999.

- (a) The four (4) packaging rotogravure printing presses (P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U8) shall limit emissions to no more than four (4) percent of the mass of inks, coatings, varnishes, adhesives, primers, solvents, reducers, thinners, and other materials applied for the month.
- (b) Pursuant to 40 CFR 63.825(b)(9), to demonstrate compliance with this standard, the Permittee shall, for each press, operate a capture system and control device and limit the organic HAP emission rate to no more than 0.04 kg organic HAP emitted per kg material applied as determined on a monthly average as-applied basis. The Permittee shall demonstrate compliance in accordance with the following provisions of 40 CFR 63.825(d):
 - (1) The Permittee shall demonstrate compliance through performance tests of capture efficiency and control device efficiency following the procedures in Condition D.9.9(a); and
 - (2) The Permittee shall demonstrate continuing compliance through continuous monitoring of capture system and control device operating parameters following the procedures in Condition D.9.14.
- (c) The Permittee shall determine the organic HAP content of each ink, coating, varnish, adhesive, primer, solvent, and other material applied during the month following the procedure in 40 CFR 63.827(b)(2) and Condition D.9.9(c) and (d).
- (d) The Permittee shall determine the organic HAP emissions for the affected source for the month by summing all organic HAP emissions calculated according to Condition D.9.9(b). The source is in compliance for the month if:
 - (1) All operating parameters required to be monitored under Condition D.9.14 were maintained at the appropriate values; and
 - (2) The total mass of organic HAP emitted by the source was not more than four percent of the total mass of inks, coatings, varnishes, adhesives, primers, solvents, diluents, reducers, thinners, and other materials applied by the source.

D.9.4 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

The source-wide potential to emit VOC is limited to less than 250 tons per year to be a minor source under 326 IAC 2-2 (PSD) and 40 CFR 52.21. The total input VOC, including coatings, dilution solvents, and cleaning solvents, to Presses #1 through #4 (emission units P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U8) shall be limited to 3,458 tons per twelve (12) consecutive month period. VOC emissions from each press shall be controlled by a capture and incineration system that achieves a minimum overall VOC control efficiency of 94%. This usage limitation will then be equivalent to a VOC emission limitation of 207.5 tons per year.

The above emission limits including VOC limits from Alternative Operating Scenarios 1 through 8 and 10 and VOC emissions from natural gas combustion, solvent degreasing and the insignificant activities will limit source-wide VOC emissions to less than 250 tons per year.

D.9.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and the control devices.

D.9.6 Startup, Shutdown, and Malfunction Plan [40 CFR 63.6(e)(3) General Provisions] [326 IAC 20-1-1] [326 IAC 2-4.1]

Pursuant to the Printing and Publishing Industry NESHAP, the Permittee shall develop and implement a written startup, shutdown, and malfunction (SSM) plan that describes, in detail, procedures for operating and maintaining the facility during periods of startup, shutdown, and malfunction and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with 40 CFR 63, Subpart KK. As required under 40 CFR 63.8(c)(1)(i) (General Provisions), the plan shall identify all routine or otherwise predictable continuous monitoring system (CMS) malfunctions. This plan shall have been developed by the Permittee by the facility's compliance date, May 30, 1999. The plan shall be incorporated by reference into the source's Part 70 permit.

(a) The purpose of the SSM plan is to –

- (1) Ensure that, at all times, the Permittee operates and maintains the facility, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions at least to the level required by the rule;
- (2) Ensure that the Permittee is prepared to correct malfunctions as soon as practicable after their occurrence in order to minimize excess emissions of HAP; and
- (3) Reduce the reporting burden associated with periods of startup, shutdown, and malfunction (including corrective action taken to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation).

(b) During periods of startup, shutdown, and malfunction, the Permittee shall operate and maintain the facility (including associated air pollution control equipment) in accordance with the procedures specified in the SSM plan developed under this condition.

(c) Record keeping associated with the SSM plan is identified in Condition D.9.17. Reporting

associated with the SSM plan is identified in Condition D.9.22.

- (d) The Permittee shall keep the written SSM plan on record after it is developed to be made available for inspection, upon request, by IDEM, OAQ for the life of the facility or until the facility is no longer subject to this rule. In addition, if the SSM plan is revised, the Permittee shall keep previous (i.e., superseded) versions of the SSM plan on record, to be made available for inspection, upon request, by IDEM, OAQ, for a period of 5 years after each revision to the plan. Revisions to the SSM plan are automatically incorporated by reference and do not require a permit revision.
- (e) To satisfy the requirements of this condition, the Permittee may use the facility's standard operating procedures (SOP) manual, or an Occupational Safety and Health Administration (OSHA) or other plan, provided the alternative plans meet all the requirements of this condition and are made available for inspection when requested by IDEM, OAQ.
- (f) IDEM, OAQ shall determine whether acceptable operation and maintenance procedures are being used, based on information available to IDEM, OAQ, which may include, but is not limited to, monitoring results, review of operation and maintenance procedures (including the SSM plan required in this condition), review of operation and maintenance records, and inspection of the facility.

Based on the results of such determination, IDEM, OAQ may require that the Permittee make changes to the SSM plan for the facility. IDEM, OAQ may require reasonable revisions to a SSM plan, if IDEM, OAQ finds that the plan:

- (1) Does not address a startup, shutdown, or malfunction event that has occurred;
 - (2) Fails to provide for the operation of the facility (including associated air pollution control equipment) during a startup, shutdown, or malfunction event in a manner consistent with good air pollution control practices for minimizing emissions at least to the levels required by all relevant standards; or
 - (3) Does not provide adequate procedures for correcting malfunctioning process and/or air pollution control equipment as quickly as practicable.
- (g) If the SSM plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction but was not included in the SSM plan at the time the Permittee developed the plan, the Permittee shall revise the SSM plan within forty-five (45) days after the event to include detailed procedures for operating and maintaining the facility during similar malfunction events and a program of corrective action for similar malfunctions of process or air pollution control equipment.

D.9.7 Enforcement Action [Agreed Order A-3820]

The Permittee shall comply with Agreed Order #A-3820, effective November 30, 1998. The Agreed Order is effective for a period of four (4) years from the Effective Date of the Agreed Order.

Compliance Determination Requirements

D.9.8 Testing Requirements [326 IAC 8-1-12]

Pursuant to 326 IAC 8-5-5(c)(3)(B) and 326 IAC 8-1-12, each incineration control system shall be tested according to the following schedule and in the following situations:

- (a) An initial compliance test shall be conducted. Compliance tests shall be conducted no later than every thirty (30) months after the date of the initial test.
- (b) A compliance test shall be conducted whenever the Permittee chooses to operate a control system under conditions different from those that were in place at the time of the previous test.
- (c) A compliance test shall be performed within ninety (90) days of:
 - (1) Startup of a new coating facility;
 - (2) Changing the method of compliance for an existing coating facility from compliant coatings or daily-weighted averaging to control devices; or
 - (3) Receipt of a written request from IDEM, OAQ or the U.S. EPA.
- (d) All compliance tests shall be conducted according to a protocol approved by IDEM, OAQ at least thirty (30) days before the test. The protocol shall contain, at a minimum, the following information:
 - (1) Test procedures;
 - (2) Operating and control system parameters;
 - (3) Type of VOC containing process material being used; and
 - (4) The process and control system parameters that will be monitored during the test.

D.9.9 Testing Requirements [40 CFR Part 63, Subpart KK] [326 IAC 20-18-1] [326 IAC 2-4.1]

Pursuant to the Printing and Publishing Industry NESHAP, the Permittee shall comply with the following requirements:

- (a) Pursuant to 40 CFR 63.825(d)(1), the Permittee shall demonstrate initial compliance through performance tests of capture efficiency and control device efficiency and continuing compliance through continuous monitoring of capture system and control device operating parameters following the procedures outlined below.
 - (1) Determine the oxidizer destruction efficiency (E) for each of the control devices using the following procedure pursuant to 40 CFR 63.827(d):
 - (A) An initial performance test to establish the destruction efficiency and the associated combustion zone temperature for each thermal oxidizer and the associated catalyst bed inlet temperature for each catalytic oxidizer shall be conducted and the data reduced in accordance with the following reference methods and procedures:
 - (i) Method 1 or 1A of 40 CFR 60, Appendix A is used for sample and velocity traverses to determine sampling locations.
 - (ii) Method 2, 2A, 2C, or 2D of 40 CFR 60, Appendix A is used to determine gas volumetric flow rate.

- (iii) Method 3 of 40 CFR 60, Appendix A is used for gas analysis to determine dry molecular weight.
- (iv) Method 4 of 40 CFR 60, Appendix A is used to determine stack gas moisture.
- (v) Methods 2, 2A, 3, and 4 of 40 CFR 60, Appendix A shall be performed, as applicable, at least twice during each test period.
- (vi) Method 25 of 40 CFR 60, Appendix A, shall be used to determine organic volatile matter concentration, except as provided in (a) through (c) below. The Permittee shall submit notice of the intended test method to IDEM, OAQ for approval along with notice of the performance test required under 40 CFR 63.7(c) (General Provisions). The Permittee may use Method 25A of 40 CFR 60, Appendix A, if:
 - (a) An exhaust gas organic volatile matter concentration of 50 parts per million by volume (ppmv) or less is required to comply with Condition D.1.3; or
 - (b) The organic volatile matter concentration at the inlet to the control system and the required level of control are such to result in exhaust gas organic volatile matter concentrations of 50 ppmv or less; or
 - (c) Because of the high efficiency of the control device, the anticipated organic volatile matter concentration at the control device exhaust is 50 ppmv or less, regardless of inlet concentration.
- (vii) Each performance test shall consist of three separate runs; each run conducted for at least one hour under the conditions that exist when the affected source is operating under normal operating conditions. For the purpose of determining organic volatile matter concentrations and mass flow rates, the average of results of all runs shall apply.
- (viii) Organic volatile matter mass flow rates shall be determined using the following equation:

$$M_f = Q_{sd} \sum_{i=1}^n [3 C_i M W_i] [0.0416] [10^{-6}]$$

where the symbols of this equation are defined in 40 CFR 63.822 (Definitions).

- (ix) Emission control device efficiency shall be determined using the following equation:

$$E = [M_{fi} - M_{fo}] / M_{fi}$$

where the symbols of this equation are defined in 40 CFR 63.822 (Definitions).

- (B) The Permittee shall record such process information as may be necessary to determine the conditions of the performance test. Operations during periods of start-up, shutdown, and malfunction shall not constitute representative conditions for the purpose of a performance test.
- (C) For the purpose of determining the value of the oxidizer operating parameter that will demonstrate continuing compliance, the time-weighted average of the values recorded during the performance test shall be computed. For each thermal oxidizer, the Permittee shall establish as the operating parameter the minimum combustion temperature. For each catalytic oxidizer, the Permittee shall establish as the operating parameter the minimum gas temperature upstream of the catalyst bed. These minimum temperatures are the operating parameter values that demonstrate continuing compliance with the requirements of Condition D.9.3.
- (2) Pursuant to 40 CFR 63.827(e)(1), determine the capture system capture efficiency (F) of each capture system venting organic emissions to a control device for the purposes of meeting the requirements of Condition D.9.3 by conducting a performance test in accordance with Procedure T – Criteria for and Verification of a Permanent or Temporary Total Enclosure as found in 40 CFR 52.741, Appendix B to confirm that an enclosure meets the requirements for permanent total enclosure. For permanent total enclosures, capture efficiency shall be assumed as 100 percent.
- (3) Calculate the overall organic HAP control efficiency, (R), achieved by each control device and capture system using the following equation:
- $$R = EF / 100$$
- where E and F are determined according to paragraphs (a)(1) and (2) of this condition.
- (4) Based on stack tests conducted in November and December of 1999 and June of 2000, the Permittee shall operate the oxidizers at all times the presses are in operation, maintain the 100 percent capture efficiencies, and demonstrate continuous compliance in accordance with the following:
- (A) The catalytic oxidizing incinerator identified as OXD#1 shall maintain a minimum operating temperature of 650°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain compliance with Conditions D.9.3, and D.9.9(d).

- (B) The catalytic oxidizing incinerators identified as OXD#2 and OXD#3 shall each maintain a minimum operating temperature of 600°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain compliance with Conditions D.9.3, and D.9.9(d).
 - (C) The thermal oxidizing incinerator identified as OXD#4 shall maintain a minimum operating temperature of 1,500°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain compliance with Conditions D.9.3, and D.9.9(d).
 - (D) The catalytic oxidizing incinerator identified as OXD#5 shall maintain a minimum operating temperature of 600°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain compliance with Conditions D.9.3, and D.9.9(d).
- (b) Pursuant to 40 CFR 63.825(g), the Permittee shall determine the mass of organic HAP emitted using the following procedure:
- (1) Determine the sum of the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on intermittently-controllable work stations in bypass mode and the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on never-controlled work stations during the month, M_{Bi} .
 - (2) Determine the sum of the mass of all solvents, reducers, thinners, and other diluents which are applied on intermittently-controllable work stations in bypass mode and the mass of all solvents, reducers, thinners, and other diluents which are applied on never-controlled work stations during the month, M_{Bj} .
 - (3) Determine the sum of the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on intermittently-controllable work stations in controlled mode and the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on always-controlled work stations during the month, M_{Ci} .
 - (4) Determine the sum of the mass of all solvents, reducers, thinners, and other diluents which are applied on intermittently-controllable work stations in controlled mode and the mass of all solvents, reducers, thinners, and other diluents which are applied on always-controlled work stations during the month, M_{Cj} .
 - (5) Calculate the organic HAP emitted during the month using the following equation:

$$H = \left[\sum_{i=1}^p M_{Ci} C_{hi} + \sum_{j=1}^q M_{Cj} C_{hj} \right] * \left[1 - \left(\frac{E}{100} * \frac{F}{100} \right) \right] + \left[\sum_{i=1}^p M_{Bi} C_{hi} + \sum_{j=1}^q M_{Bj} C_{hj} \right]$$

where the symbols of this equation are defined in 40 CFR 63.822 (Definitions).

- (c) Pursuant to 40 CFR 63.827(b)(2), the Permittee shall determine the organic HAP weight fraction of each ink, coating, varnish, adhesive, primer, solvent, thinner, reducer, diluent, and other material applied by following the procedure in 40 CFR 63.827(c)(2) included below and shall use this value for the organic HAP content for all compliance purposes.
 - (1) The Permittee shall determine the volatile matter and solids weight-fraction of each ink, coating, varnish, adhesive, primer, solvent, reducer, thinner, diluent, and other material applied using Method 24 of 40 CFR part 60, appendix A. The Method 24 determination may be performed by the manufacturer of the material and the results provided to the Permittee.
 - (2) If these values cannot be determined using Method 24, the Permittee shall submit an alternative technique for determining their values for approval by the Administrator.
 - (3) The Permittee may rely on formulation data, subject to the following, in accordance with the provisions of 40 CFR 63.827(c)(3):
 - (A) The Permittee may determine the volatile matter content of materials based on formulation data, and may rely on volatile matter content data provided by material suppliers; and
 - (B) In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR part 60, appendix A, the applicable test method shall govern, unless after consultation, the Permittee can demonstrate to the satisfaction of the enforcement agency that the formulation data are correct.
- (d) Pursuant to 40 CFR 63.825(d)(1)(xi), the Permittee is in compliance if the oxidizers are operated such that the average combustion temperature or average temperature upstream of the catalyst bed is greater than the operating parameter established in accordance with 40 CFR 63.828(a)(4) and Condition D.9.9 for each three-hour period, and the organic HAP emission rate based on material applied, S, is 0.04 kg organic HAP per kg material applied or less.

D.9.10 Testing Requirements [Agreed Order A-3820]

Pursuant to Agreed Order A-3820, effective November 30, 1998, the Permittee shall conduct annual VOC testing at Presses Nos. 1, 2, 3, and 4 to demonstrate compliance with 326 IAC 8-5-5 and applicable permit conditions. This testing shall be conducted in accordance with the requirements of 326 IAC 3-6, Source Sampling Procedures. The Permittee shall conduct the first of these tests within the fourth quarter of 1999. Subsequent tests shall be conducted during the fourth quarter of each consecutive year. This requirement shall cease after the tests conducted in the fourth quarter 2000 provided that the Permittee demonstrated complete compliance with 326 IAC 8-5-5 and applicable permit conditions during both the 1999 and 2000 tests. The performance of annual VOC testing under this Order shall otherwise satisfy any similar VOC testing requirements imposed on the Permittee under its air permits for the period of the Agreed Order.

D.9.11 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.9.1 and D.9.4 shall be determined pursuant to 326 IAC 8-1-2(a) and 326 IAC 8-1-4(a)(3) using formulation data supplied by the coating manufacturer.

D.9.12 VOC Emissions

Compliance with Condition D.9.4 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the twelve (12) month period.

D.9.13 Volatile Organic Compounds (VOC) Control

- (a) The catalytic and thermal oxidizers controlling VOC emissions from Presses #1 through #4 (emission units P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U8) shall be in operation at all times that these units are in operation to ensure compliance with condition D.9.4.
- (b) The catalytic oxidizing incinerator identified as OXD#1 shall maintain a minimum operating temperature of 650°F during operation or a temperature that has been determined from the most recent compliant stack tests to maintain compliance with condition D.9.4.
- (c) The catalytic oxidizing incinerators identified as OXD#2, and OXD#3 shall each maintain a minimum operating temperature of 600°F during operation or a temperature that has been determined from the most recent compliant stack tests to maintain compliance with condition D.9.4.
- (d) The thermal oxidizing incinerator identified as OXD #4 shall maintain a minimum operating temperature of 1,500°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain compliance with condition D.9.4.
- (e) The catalytic oxidizing incinerator identified as OXD #5 shall maintain a minimum operating temperature of 600°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain compliance with condition D.9.4.

Note: The use of the oxidizers to control VOC emissions from Presses #1 through #4 to comply with the PSD minor VOC emission limitation was voluntarily proposed by the source. Therefore, the source may apply for a modification to remove the requirement to operate the oxidizers at all times that any of the presses are in operation under this Alternative Operating Scenario at any time if compliance with the PSD minor VOC emission limit can be achieved by other means.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.9.14 Monitoring Requirements [326 IAC 8-1-12]

Pursuant to 326 IAC 8-5-5(c)(3)(B) and 326 IAC 8-1-12, the monitoring equipment requirements shall be as follows:

- (a) When the thermal incinerator is used for VOC reduction, a temperature monitoring device capable of continuously recording the temperature of the gas stream in the combustion zone of the incinerator shall be used. The temperature monitoring device shall have an accuracy of one percent (1%) of the temperature being measured in degrees Centigrade, or plus or minus five-tenths degree Centigrade ($\pm 0.5^{\circ}\text{C}$), whichever is more accurate; and

- (b) When a catalytic incinerator is used for VOC reduction, a temperature device capable of continuously recording the temperature in the gas stream immediately before and after the catalyst bed of each incinerator shall be used. The temperature monitoring device shall have an accuracy of one percent (1%) of the temperature being measured in degrees Centigrade, or plus or minus five-tenths degree Centigrade ($\pm 0.5^{\circ}\text{C}$), whichever is more accurate.

D.9.15 Monitoring Requirements [40 CFR 63.828] [326 IAC 20-18-1] [326 IAC 2-4.1]

Pursuant to the Printing and Publishing Industry NESHAP, following the date on which the initial performance test of a control device is completed, to demonstrate continuing compliance with the standard, the Permittee shall monitor and inspect each control device required to comply with Condition D.9.3 to ensure proper operation and maintenance by implementing the following requirements:

- (a) The Permittee shall, for each dryer associated with an intermittently-controllable work station, secure any bypass line valve in the closed position with a car-seal or a lock-and-key type configuration. A visual inspection of the seal or closure mechanism shall be performed at least once every month to ensure that the valve or damper is maintained in the closed position and the exhaust stream is not diverted through the bypass line.
- (b) For the thermal oxidizer, the Permittee shall install, calibrate, operate, and maintain a temperature monitoring device equipped with a continuous recorder. The device shall have an accuracy of ± 1 percent of the temperature being monitored in $^{\circ}\text{C}$ or $\pm 1^{\circ}\text{C}$, whichever is greater. The thermocouple or temperature sensor shall be installed in the combustion chamber at a location in the combustion zone.
- (c) For each catalytic oxidizer, the Permittee shall install, calibrate, operate, and maintain a temperature monitoring device equipped with a continuous recorder. The device shall be capable of monitoring temperature with an accuracy of ± 1 percent of the temperature being monitored in $^{\circ}\text{C}$ or $\pm 1^{\circ}\text{C}$, whichever is greater. The thermocouple or temperature sensor shall be installed in the vent stream at the nearest feasible point to the catalyst bed inlet.
- (d) All temperature monitoring equipment shall be installed, calibrated, maintained, and operated according to manufacturers' specifications. The calibration of the chart recorder, data logger, or temperature indicator shall be verified every three months; or the chart recorder, data logger, or temperature indicator shall be replaced. The replacement shall be done either if the Permittee chooses not to perform the calibration, or if the equipment cannot be calibrated properly.
- (e) Any excursion from the required operating parameters which are monitored in accordance with this condition and Condition D.9.9(c)(4) and (d), unless otherwise excused, shall be considered a violation of Condition D.9.3.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.9.16 Contemporaneous Log for Alternate Operating Scenarios [326 IAC 2-7-5(9)]

- (a) Pursuant to 326 IAC 2-7-5(9)(A), contemporaneously with making a change from one alternative operating scenario to another, the Permittee shall make a record in a log at the permitted facility of the scenario under which it is operating. The record should state the alternative operating scenario for each station, since different stations at the same press

may be operating under different scenarios.

- (b) The records required in paragraph (a) of this condition shall be maintained in accordance with the requirements of Condition C.20 and 326 IAC 8-1-9(c).

D.9.17 Record Keeping Requirements [326 IAC 8-1-12]

- (a) Pursuant to 326 IAC 8-1-12(c), upon changing the method of compliance for an existing coating facility from the use of compliant coatings (326 IAC 8-5-5(c)(1), (2), or (4)) to control devices (326 IAC 8-5-5(c)(3)(B)), the Permittee shall collect and record each day and maintain all of the following information for each coating facility:
- (1) The name and identification of each coating used at each coating facility.
 - (2) The mass of VOC per unit volume of coating solids, as applied, the volume solids content, as applied, and the volume, as applied, of each coating expressed in units necessary to determine compliance, used each day at each coating facility.
 - (3) The maximum VOC content (mass of VOC per unit volume of coating solids, as applied) or the daily weighted average VOC content (mass of VOC per unit volume of coating solids, as applied) of the coatings used each day on each coating facility.
 - (4) The required overall emission reduction efficiency for each day for each coating facility.
 - (5) The actual overall emission reduction efficiency achieved for each day for each coating facility as determined during the compliance test required by Condition D.9.8 pursuant to 326 IAC 8-1-12(b)(1)(C).
 - (6) Control device monitoring data as follows:
 - (A) For the thermal incinerator, the following:
 - (i) Continuous records of the temperature in the gas stream in the combustion zone of the incinerator; and
 - (ii) Records of all three (3) hour periods of operation in which the average combustion temperature of the gas stream in the combustion zone was more than fifty degrees Fahrenheit (50°F) (twenty-eight degrees Centigrade (28°C)) below the average combustion temperature that existed during the most recent test that demonstrated that the coating facility was in compliance.
 - (B) For each catalytic incinerator, the following:
 - (i) Continuous records of the temperature of the gas stream both upstream and downstream of the catalyst bed of the incinerator;
 - (ii) Records of all three (3) hour periods of operation in which the average temperature measured at the process vent stream immediately before the catalyst bed is more than fifty degrees

Fahrenheit (50°F) (twenty-eight degrees Centigrade (28°C)) below the average temperature of the process vent stream that existed during the most recent test that demonstrated that the coating facility was in compliance; and

- (iii) Records of all three (3) hour periods of operation in which the average temperature difference across the catalyst bed is less than eighty percent (80%) of the temperature difference measured during the most recent test that demonstrated that the coating facility was in compliance.
- (7) A log of operating time for each capture system, control device, monitoring equipment, and the associated coating facility.
- (8) A maintenance log for each capture system, control device, and monitoring equipment detailing all routine and nonroutine maintenance performed including dates and duration of any outages.
- (b) The records required in paragraph (a) of this condition shall be maintained in accordance with the requirements of Condition C.20 and 326 IAC 8-1-9(c).

D.9.18 Record Keeping Requirements [40 CFR 63.829] [326 IAC 20-18-1] [326 IAC 2-4.1]

- (a) Pursuant to the Printing and Publishing Industry NESHAP, the Permittee shall maintain the following records on a monthly basis:
 - (1) Records of all measurements needed to demonstrate compliance with Conditions D.9.3 and D.9.6. These records shall include at a minimum the following specified in 40 CFR 63.10(b)(2) (General Provisions) that are applicable:
 - (A) The occurrence and duration of each startup, shutdown, or malfunction of operation (i.e., process equipment);
 - (B) The occurrence and duration of each malfunction of the air pollution control equipment;
 - (C) All maintenance performed on the air pollution control equipment;
 - (D) Actions taken during periods of startup, shutdown, and malfunction (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation) when such actions are different from the procedures specified in the SSM plan required by Condition D.9.6;
 - (E) All information necessary to demonstrate conformance with the SSM plan required in Condition D.9.6 when all actions taken during periods of startup, shutdown, and malfunction (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation) are consistent with the procedures specified in such plan (The information needed to demonstrate conformance with the SSM plan may be recorded using a "checklist", or some other effective form or record keeping, in order to minimize the record keeping burden for

conforming events);

- (F) Each period during which a continuous monitoring system (CMS) is malfunctioning or inoperative (including out-of-control periods);
 - (G) All required measurements needed to demonstrate compliance with Condition D.9.3 (including, but not limited to, 15-minute averages of CMS data, raw performance testing measurements, raw performance evaluation measurements, and control device and capture system operating parameter data, that support data that the source is required to report);
 - (H) All results of performance tests and CMS performance evaluations;
 - (I) All measurements as may be necessary to determine the conditions of performance tests and performance evaluations;
 - (J) All CMS calibration checks;
 - (K) All adjustments and maintenance performed on CMS; and
 - (L) All documentation supporting initial notifications of compliance status under 40 CFR 63.9 (General Provisions).
- (2) Records for each CMS operated by the Permittee in accordance with the requirements of Condition D.9.14. These records are in addition to complying with the requirements specified in paragraph (a)(1) of this condition, and shall include at a minimum the following specified in 40 CFR 63.10(c) (General Provisions) that are applicable:
- (A) All required CMS measurements (including monitoring data recorded during unavoidable CMS breakdowns and out-of-control periods);
 - (B) The date and time identifying each period during which the CMS was inoperative except for zero (low-level) and high-level checks;
 - (C) The date and time identifying each period during which the CMS was out of control, as defined in 40 CFR 63.8(c)(7) (General Provisions);
 - (D) The specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions and parameter monitoring exceedances, as defined in the rule, that occurs during startups, shutdowns, and malfunctions of the facility;
 - (E) The specific identification (i.e., the date and time of commencement and completion) of each time period of excess emissions and parameter monitoring exceedances, as defined in the rule, that occurs during periods other than startups, shutdowns, and malfunctions of the facility;
 - (F) The nature and cause of any malfunction (if known);
 - (G) The corrective action taken or preventive measures adopted;

- (H) The nature of the repairs or adjustments to the CMS that was inoperative or out of control;
- (I) The total process operating time during the reporting period; and
- (J) All procedures that are part of a quality control program developed and implemented for CMS under 40 CFR 63.8(d) (General Provisions).

In order to satisfy the requirements of paragraphs (F) through (H) of this condition and to avoid duplicative record keeping efforts, the Permittee may use the SSM plan or records kept to satisfy the record keeping requirements of the SSM plan specified in Condition D.9.6, provided that such plan and records adequately address the requirements of paragraphs (F) through (H) of this condition.

- (b) The records required in paragraph (a) of this condition shall be maintained in accordance with the following requirements of 40 CFR 63.10(b)(1) (General Provisions):
 - (1) The Permittee shall maintain files of all information (including all reports and notifications) required by this rule recorded in a form suitable and readily available for expeditious inspection and review.
 - (2) The files shall be retained for at least five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent two years of data shall be retained on site. The remaining three years of data may be retained off site.
 - (3) Such files may be maintained on microfilm, on a computer, on computer floppy disks, on magnetic tape disks, or on microfiche.

D.9.19 Record Keeping Requirements

- (a) To document compliance with Condition D.9.4, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limit and/or the VOC emission limit established in Condition D.9.4.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;
 - (2) A log of the dates of use;
 - (3) The total VOC usage for each month at each press while operating the incinerators;
 - (4) The weight of VOCs emitted for each compliance period for each press; and
 - (5) The continuous temperature records for the catalytic and thermal incinerators and the temperature used to demonstrate compliance during the most recent compliance stack test.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping

Requirements, of this permit.

D.9.20 Record Keeping Requirements [Agreed Order A-3820]

Pursuant to Agreed Order #A-3820, effective November 30, 1998, for a period of four (4) years, the Permittee shall maintain, and provide upon request, a record of all times that an incinerator is overloaded or shuts down and results in the triggering of the automatic press shut-off. This record should include the dates, times, and the presses and incinerators involved in each of these incidents.

D.9.21 Reporting Requirements [326 IAC 8-1-12]

Pursuant to 326 IAC 8-5-5(c)(3)(B) and 326 IAC 8-1-12, the Permittee shall notify IDEM, OAQ in either of the following instances:

- (a) Any record showing noncompliance with the applicable requirements for control devices shall be reported by submitting a copy of the record to IDEM, OAQ within thirty (30) days following noncompliance; such record shall also be submitted with the quarterly compliance monitoring report attached to this permit. The following information shall accompany each submittal:
 - (1) Name and location of the coating facility;
 - (2) Identification of the control system where the noncompliance occurred and the coating facility it served;
 - (3) Time, date and duration of the noncompliance; and
 - (4) Corrective action taken.
- (b) At least thirty (30) calendar days before changing the method of compliance from control devices (326 IAC 8-5-5(c)(3)(B)) to the use of compliant coatings (326 IAC 8-5-5(c)(1), (2), or (4)), the Permittee shall comply with all applicable requirements of 326 IAC 8-1-10(b). Upon changing the method of compliance from control devices to the use of compliant coatings, the Permittee shall comply with all requirements of 326 IAC 8-1-10(b), applicable to the coating facility subject to 326 IAC 8-5-5.

D.9.22 Reporting Requirements

- (a) A quarterly summary of the information to document compliance with Condition D.9.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. This quarterly summary report can be submitted in the same summary report required for Alternative Operating Scenarios 1 through 8 and 10 in Conditions D.1.17(a), D.2.17(a), D.3.17(a), D.4.17(a), D.5.17(a), D.6.17(a), D.7.21(a), D.8.21(a), and D.10.21(a). The report submitted by the Permittee does require the certification by the responsible official" as defined by 326 IAC 2-7-1(34).
- (b) Pursuant to 326 IAC 2-7-5(9)(C), the Permittee shall include a summary of the records required under Condition D.9.15 in the annual compliance certification submitted under 326 IAC 2-7-6(5) and Condition B.11.

D.9.23 Reporting Requirements [40CFR 63.830] [326 IAC 20-18-1] [326 IAC 2-4.1]

Pursuant to the Printing and Publishing Industry NESHAP, the Permittee shall submit the reports

and plans listed below to the following addresses:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (a) A Notification of Performance Tests specified in 40 CFR 63.7 and 63.9(e) (General Provisions). This notification, and the site-specific test plan required under 40 CFR 63.7(c)(2) (General Provisions) shall identify the operating parameter to be monitored to ensure that the capture efficiency measured during the performance test is maintained. The operating parameter identified in the site-specific test plan shall be considered to be approved unless explicitly disapproved, or unless comments received from IDEM, OAQ require monitoring of an alternate parameter.
- (b) A Notification of Compliance Status specified in 40 CFR 63.9(h) (General Provisions). This notification can be submitted in the same notification required for Alternative Operating Scenarios 1 through 8 and 10 in Conditions D.1.18(a), D.2.18(a), D.3.18(a), D.4.18(a), D.5.18(a), D.6.18(a), D.7.22(b), D.8.22(b), and D.10.22(b).
- (c) Performance test reports specified in 40 CFR 63.10(d)(2) (General Provisions).
- (d) Start-up, shutdown and malfunction (SSM) reports specified in 40 CFR 63.10(d)(5) (General Provisions).
 - (1) If actions taken by the Permittee during a start-up, shutdown, or malfunction of the facility (including actions taken to correct a malfunction) are not completely consistent with the procedures specified in the facility's SSM plan specified in Condition D.9.6, the Permittee shall report the actions taken for that event in strict accordance with 40 CFR 63.10(d)(5)(ii), i.e., within two (2) working days after commencing actions inconsistent with the plan, followed by a letter within seven (7) working days after the end of the event. The SSM report shall consist of a letter containing the name, title, and signature of the responsible official who is certifying its accuracy; shall be submitted to IDEM, OAQ; and shall otherwise comply with the provisions of 40 CFR 63.10(d)(5)(ii).
 - (2) Separate start-up, shutdown, or malfunction reports are not required if the information is included in the report specified in paragraph (e) of this condition.
- (e) A summary report specified in 40 CFR 63.10(e)(3) (General Provisions) shall be submitted on a semi-annual basis (i.e., once every six-month period). In addition to a report of operating parameter exceedances as required by 40 CFR 63.10(e)(3)(i) (General Provisions), the summary report shall include exceedances of the standards in Condition D.9.3. This summary report can be submitted in the same summary report required for

Alternative Operating Scenarios 1 through 8 and 10 in Conditions D.1.18(b), D.2.18(b), D.3.18(b), D.4.18(b), D.5.18(b), D.6.18(b), D.7.22(e), D.8.22(e), and D.10.22(e).

SECTION D.10 **FACILITY OPERATION CONDITIONS**
Alternative Operating Scenario 10 for Printing Stations Using Solvent-Based Materials

Facility Description [326 IAC 2-7-5(15)] - The following packaging rotogravure printing operations:

- (1) one (1) ten (10) station packaging rotogravure printing press identified as Press #1 (ten stations: P1U1 through P1U10), constructed in May of 1990, with a maximum line speed of 840 feet per minute (ft/min) when printing with ink and 740 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system with a total heat input rate of 7.76 million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) emissions from P1U1-P1U10 are controlled by one of the following:
 - (a) a single catalytic oxidizing incinerator identified as OXD#1 exhausting through one (1) stack (S/V ID: S-OXD1); or
 - (b) a single catalytic oxidizing incinerator identified as OXD#2 exhausting through one (1) stack (S/V ID: S-OXD2); or
 - (c) two (2) catalytic oxidizing incinerators configured in parallel, respectively identified as OXD#1 and OXD#2, with each incinerator exhausting through one (1) stack (S/V ID: S-OXD1 and S-OXD2), respectively.
- (2) one (1) nine (9) station packaging rotogravure printing press identified as Press #2 (nine stations: P2U1 through P2U9), constructed in April of 1991, with a maximum line speed of 840 feet per minute (ft/min) when printing with ink and 740 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system with a total heat input rate of 7.76 million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) emissions from P2U1-P2U9 are controlled by one of the following:
 - (a) a single catalytic oxidizing incinerator identified as OXD#2 exhausting through one (1) stack (S/V ID: S-OXD2); or
 - (b) a single catalytic oxidizing incinerator identified as OXD #5 exhausting through one (1) stack (S/V ID: S-OXD5); or
 - (c) two (2) catalytic oxidizing incinerators configured in parallel, respectively identified as OXD#2 and OXD#5, with each incinerator exhausting through one (1) stack (S/V ID: S-OXD2 and S-OXD5), respectively.
- (3) one (1) eight (8) station packaging rotogravure printing press identified as Press #3 (eight stations: P3U1 through P3U8), constructed in April of 1997, with a maximum line speed of 800 ft/min when printing with ink and 700 ft/min when printing with ink and adhesive. The volatile organic compound (VOC) emissions from P3U1-P3U8 are controlled by one catalytic oxidizing incinerator identified as OXD#5 exhausting through one (1) stack (S/V ID: S-OXD5).
- (4) one (1) eight (8) station packaging rotogravure printing press identified as Press #4 (eight stations: P4U1 through P4U8), constructed in January of 1997, with a maximum line speed of 800 feet per minute (ft/min) when printing with ink and 700 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system with a total heat input rate of twelve (12) million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) emissions from P4U1-P4U8 are controlled by one of the following:
 - (a) a single catalytic oxidizing incinerator identified as OXD#3 exhausting through one (1) stack (S/V ID: S-OXD3); or
 - (b) a single thermal oxidizing incinerator identified as OXD#4 exhausting through one (1) stack (S/V ID: S-OXD4); or
 - (c) catalytic and thermal oxidizing incinerators configured in parallel, respectively identified

as OXD#3 and OXD#4, with each incinerator exhausting through one (1) stack (S/V ID: S-OXD3 and S-OXD4), respectively.
(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.10.1 Graphic Arts Operations [326 IAC 8-5-5] [326 IAC 8-1-12]

- (a) Pursuant to 326 IAC 8-5-5(c)(3)(B) (Graphic Arts Operations), the Permittee may not cause, allow, or permit the operation of the facility unless the Permittee installs and operates an incineration system(s) that oxidizes at least ninety percent (90%) of the nonmethane volatile organic compounds (volatile organic compounds measured as total combustible carbon) to carbon dioxide and water.
- (b) A capture system must be used in conjunction with each emission control system. The capture system shall attain an efficiency sufficient to achieve an overall control efficiency, in conjunction with the emission control system, of sixty-five percent (65%) for packaging rotogravure processes.
- (c) Pursuant to 326 IAC 8-5-5(c)(3)(B), the following shall apply:
 - (1) The catalytic oxidizing incinerator identified as OXD #1 shall maintain a minimum operating temperature of 650°F or a temperature determined in the most recent compliance tests (described in Condition D.10.8) to maintain a minimum 90% destruction of the nonmethane VOC captured.
 - (2) The catalytic oxidizing incinerators identified as OXD#2, and OXD #3 shall each maintain a minimum operating temperature of 600°F or a temperature determined in the most recent compliance tests (described in Condition D.10.8) to maintain a minimum 90% destruction of the nonmethane VOC captured.
 - (3) The thermal oxidizing incinerator identified as OXD #4 shall maintain a minimum operating temperature of 1,500°F or a temperature determined in the most recent compliance tests (described in Condition D.10.8) to maintain a minimum 90% destruction of the nonmethane VOC captured.
 - (4) The catalytic oxidizing incinerator identified as OXD #5 shall maintain a minimum operating temperature of 600°F or at least a temperature determined in the most recent compliance tests (described in Condition D.10.8) to maintain a minimum 90% destruction of the nonmethane VOC captured.
- (d) Pursuant to 326 IAC 8-1-12 (Compliance Certification, Record Keeping and Reporting Requirements for Certain Coating Facilities Using Control Devices), this facility is subject to the following requirements when utilizing a thermal and/or catalytic oxidizer to comply with 326 IAC 8-5-5(c)(3)(B):
 - (1) Each incineration control system shall be operated and maintained according to the manufacturer's recommendations but may be modified based on the results of the initial or subsequent compliance test or upon the written request of IDEM,

OAQ.

- (2) A copy of the operating and maintenance procedures shall be maintained in a convenient location at the source property and as close to each control system as possible for reference by plant personnel and IDEM, OAQ inspectors.

D.10.2 General Provisions Relating to HAPs [326 IAC 20-1-1] [40 CFR Part 63, Subpart A] [326 IAC 2-4.1]

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section, as specified in Table 1 of 40 CFR 63, Subpart KK.

D.10.3 Printing and Publishing Industry NESHAP [326 IAC 20-18-1] [40 CFR Part 63, Subpart KK] [326 IAC 2-4.1]

This facility is subject to 40 CFR 63, Subpart KK, which is incorporated by reference as 326 IAC 20-18-1. A copy of this rule is attached. The Permittee shall comply with all applicable provisions of this rule on and after May 30, 1999.

- (a) The four (4) packaging rotogravure printing presses (P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U8) shall limit emissions to no more than a calculated equivalent allowable mass based on the organic HAP and solids contents of the inks, coatings, varnishes, adhesives, primers, solvents, reducers, thinners, and other materials applied for the month.
- (b) Pursuant to 40 CFR 63.825(b)(10), to demonstrate compliance with this standard, the Permittee shall, for each press, operate a capture system and control device and limit the monthly organic HAP emissions to less than the allowable emissions as calculated in accordance with 40 CFR 63.825(e) and Condition D.10.9(b). The Permittee shall demonstrate compliance in accordance with the following provisions of 40 CFR 63.825(d):
 - (1) The Permittee shall demonstrate compliance through performance tests of capture efficiency and control device efficiency following the procedures in Condition D.10.9(a); and
 - (2) The Permittee shall demonstrate continuing compliance through continuous monitoring of capture system and control device operating parameters following the procedures in Condition D.10.14.
- (c) The Permittee shall determine the solids content and organic HAP content of each ink, coating, varnish, adhesive, primer, solvent, and other material applied during the month following the procedure in 40 CFR 63.827(c)(2) and Condition D.10.9(c) and (d).
- (d) The Permittee shall determine the organic HAP emissions for the affected source for the month by summing all organic HAP emissions calculated according to Condition D.10.9(c). The source is in compliance for the month if:
 - (1) All operating parameters required to be monitored under Condition D.10.14 were maintained at the appropriate values; and
 - (2) The total mass of organic HAP emitted by the source was not more than the equivalent allowable organic HAP emissions for the source, H_{a1} , calculated in accordance with 40 CFR 63.825(e) and Condition D.10.9(b).

D.10.4 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

The source-wide potential to emit VOC is limited to less than 250 tons per year to be a minor source under 326 IAC 2-2 (PSD) and 40 CFR 52.21. The total input VOC, including coatings, dilution solvents, and cleaning solvents, to Presses #1 through #4 (emission units P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U8) shall be limited to 3,458 tons per twelve (12) consecutive month period. VOC emissions from each press shall be controlled by a capture and incineration system that achieves a minimum overall VOC control efficiency of 94%. This usage limitation will then be equivalent to a VOC emission limitation of 207.5 tons per year.

The above emission limits including VOC limits from Alternative Operating Scenarios 1 through 9 and VOC emissions from natural gas combustion, solvent degreasing and the insignificant activities will limit source-wide VOC emissions to less than 250 tons per year.

D.10.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and the control devices.

D.10.6 Startup, Shutdown, and Malfunction Plan [40 CFR 63.6(e)(3) General Provisions] [326 IAC 20-1-1] [326 IAC 2-4.1]

Pursuant to the Printing and Publishing Industry NESHAP, the Permittee shall develop and implement a written startup, shutdown, and malfunction (SSM) plan that describes, in detail, procedures for operating and maintaining the facility during periods of startup, shutdown, and malfunction and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with 40 CFR 63, Subpart KK. As required under 40 CFR 63.8(c)(1)(i) (General Provisions), the plan shall identify all routine or otherwise predictable continuous monitoring system (CMS) malfunctions. This plan shall have been developed by the Permittee by the facility's compliance date, May 30, 1999. The plan shall be incorporated by reference into the source's Part 70 permit.

- (a) The purpose of the SSM plan is to –
 - (1) Ensure that, at all times, the Permittee operates and maintains the facility, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions at least to the level required by the rule;
 - (2) Ensure that the Permittee is prepared to correct malfunctions as soon as practicable after their occurrence in order to minimize excess emissions of HAP; and
 - (3) Reduce the reporting burden associated with periods of startup, shutdown, and malfunction (including corrective action taken to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation).
- (b) During periods of startup, shutdown, and malfunction, the Permittee shall operate and maintain the facility (including associated air pollution control equipment) in accordance with the procedures specified in the SSM plan developed under this condition.
- (c) Record keeping associated with the SSM plan is identified in Condition D.10.17. Reporting

associated with the SSM plan is identified in Condition D.10.22.

- (d) The Permittee shall keep the written SSM plan on record after it is developed to be made available for inspection, upon request, by IDEM, OAQ for the life of the facility or until the facility is no longer subject to this rule. In addition, if the SSM plan is revised, the Permittee shall keep previous (i.e., superseded) versions of the SSM plan on record, to be made available for inspection, upon request, by IDEM, OAQ, for a period of 5 years after each revision to the plan. Revisions to the SSM plan are automatically incorporated by reference and do not require a permit revision.
- (e) To satisfy the requirements of this condition, the Permittee may use the facility's standard operating procedures (SOP) manual, or an Occupational Safety and Health Administration (OSHA) or other plan, provided the alternative plans meet all the requirements of this condition and are made available for inspection when requested by IDEM, OAQ.
- (f) IDEM, OAQ shall determine whether acceptable operation and maintenance procedures are being used, based on information available to IDEM, OAQ, which may include, but is not limited to, monitoring results, review of operation and maintenance procedures (including the SSM plan required in this condition), review of operation and maintenance records, and inspection of the facility.

Based on the results of such determination, IDEM, OAQ may require that the Permittee make changes to the SSM plan for the facility. IDEM, OAQ may require reasonable revisions to a SSM plan, if IDEM, OAQ finds that the plan:

- (1) Does not address a startup, shutdown, or malfunction event that has occurred;
 - (2) Fails to provide for the operation of the facility (including associated air pollution control equipment) during a startup, shutdown, or malfunction event in a manner consistent with good air pollution control practices for minimizing emissions at least to the levels required by all relevant standards; or
 - (3) Does not provide adequate procedures for correcting malfunctioning process and/or air pollution control equipment as quickly as practicable.
- (g) If the SSM plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction but was not included in the SSM plan at the time the Permittee developed the plan, the Permittee shall revise the SSM plan within forty-five (45) days after the event to include detailed procedures for operating and maintaining the facility during similar malfunction events and a program of corrective action for similar malfunctions of process or air pollution control equipment.

D.10.7 Enforcement Action [Agreed Order A-3820]

The Permittee shall comply with Agreed Order #A-3820, effective November 30, 1998. The Agreed Order is effective for a period of four (4) years from the Effective Date of the Agreed Order.

Compliance Determination Requirements

D.10.8 Testing Requirements [326 IAC 8-1-12]

Pursuant to 326 IAC 8-5-5(c)(3)(B) and 326 IAC 8-1-12, each incineration control system shall be tested according to the following schedule and in the following situations:

- (a) An initial compliance test shall be conducted. Compliance tests shall be conducted no later than every thirty (30) months after the date of the initial test.
- (b) A compliance test shall be conducted whenever the Permittee chooses to operate a control system under conditions different from those that were in place at the time of the previous test.
- (c) A compliance test shall be performed within ninety (90) days of:
 - (1) Startup of a new coating facility;
 - (2) Changing the method of compliance for an existing coating facility from compliant coatings or daily-weighted averaging to control devices; or
 - (3) Receipt of a written request from IDEM, OAQ or the U.S. EPA.
- (d) All compliance tests shall be conducted according to a protocol approved by IDEM, OAQ at least thirty (30) days before the test. The protocol shall contain, at a minimum, the following information:
 - (1) Test procedures;
 - (2) Operating and control system parameters;
 - (3) Type of VOC containing process material being used; and
 - (4) The process and control system parameters that will be monitored during the test.

D.10.9 Testing Requirements [40 CFR Part 63, Subpart KK] [326 IAC 20-18-1] [326 IAC 2-4.1]

Pursuant to the Printing and Publishing Industry NESHAP, the Permittee shall comply with the following requirements:

- (a) Pursuant to 40 CFR 63.825(d)(1), the Permittee shall demonstrate initial compliance through performance tests of capture efficiency and control device efficiency and continuing compliance through continuous monitoring of capture system and control device operating parameters following the procedures outlined below.
 - (1) Determine the oxidizer destruction efficiency (E) for each of the control devices using the following procedure pursuant to 40 CFR 63.827(d):
 - (A) An initial performance test to establish the destruction efficiency and the associated combustion zone temperature for each thermal oxidizer and the associated catalyst bed inlet temperature for each catalytic oxidizer shall be conducted and the data reduced in accordance with the following reference methods and procedures:
 - (i) Method 1 or 1A of 40 CFR 60, Appendix A is used for sample and velocity traverses to determine sampling locations.
 - (ii) Method 2, 2A, 2C, or 2D of 40 CFR 60, Appendix A is used to determine gas volumetric flow rate.

- (iii) Method 3 of 40 CFR 60, Appendix A is used for gas analysis to determine dry molecular weight.
- (iv) Method 4 of 40 CFR 60, Appendix A is used to determine stack gas moisture.
- (v) Methods 2, 2A, 3, and 4 of 40 CFR 60, Appendix A shall be performed, as applicable, at least twice during each test period.
- (vi) Method 25 of 40 CFR 60, Appendix A, shall be used to determine organic volatile matter concentration, except as provided in (a) through (c) below. The Permittee shall submit notice of the intended test method to IDEM, OAQ for approval along with notice of the performance test required under 40 CFR 63.7(c) (General Provisions). The Permittee may use Method 25A of 40 CFR 60, Appendix A, if:
 - (a) An exhaust gas organic volatile matter concentration of 50 parts per million by volume (ppmv) or less is required to comply with Condition D.1.3; or
 - (b) The organic volatile matter concentration at the inlet to the control system and the required level of control are such to result in exhaust gas organic volatile matter concentrations of 50 ppmv or less; or
 - (c) Because of the high efficiency of the control device, the anticipated organic volatile matter concentration at the control device exhaust is 50 ppmv or less, regardless of inlet concentration.
- (vii) Each performance test shall consist of three separate runs; each run conducted for at least one hour under the conditions that exist when the affected source is operating under normal operating conditions. For the purpose of determining organic volatile matter concentrations and mass flow rates, the average of results of all runs shall apply.
- (viii) Organic volatile matter mass flow rates shall be determined using the following equation:

$$M_f = Q_{sd} \sum_{i=1}^n [3 C_i M W_i] [0.0416] [10^{-6}]$$

where the symbols of this equation are defined in 40 CFR 63.822 (Definitions).

- (ix) Emission control device efficiency shall be determined using the following equation:

$$E = [M_{fi} - M_{fo}] / M_{fi}$$

where the symbols of this equation are defined in 40 CFR 63.822 (Definitions).

- (B) The Permittee shall record such process information as may be necessary to determine the conditions of the performance test. Operations during periods of start-up, shutdown, and malfunction shall not constitute representative conditions for the purpose of a performance test.
- (C) For the purpose of determining the value of the oxidizer operating parameter that will demonstrate continuing compliance, the time-weighted average of the values recorded during the performance test shall be computed. For each thermal oxidizer, the Permittee shall establish as the operating parameter the minimum combustion temperature. For each catalytic oxidizer, the Permittee shall establish as the operating parameter the minimum gas temperature upstream of the catalyst bed. These minimum temperatures are the operating parameter values that demonstrate continuing compliance with the requirements of Condition D.10.3.
- (2) Pursuant to 40 CFR 63.827(e)(1), determine the capture system capture efficiency (F) of each capture system venting organic emissions to a control device for the purposes of meeting the requirements of Condition D.10.3 by conducting a performance test in accordance with Procedure T – Criteria for and Verification of a Permanent or Temporary Total Enclosure as found in 40 CFR 52.741, Appendix B to confirm that an enclosure meets the requirements for permanent total enclosure. For permanent total enclosures, capture efficiency shall be assumed as 100 percent.
- (3) Calculate the overall organic HAP control efficiency, (R), achieved by each control device and capture system using the following equation:

$$R = EF / 100$$

where E and F are determined according to paragraphs (a)(1) and (2) of this condition.

- (4) Based on stack tests conducted in November and December of 1999 and June of 2000, the Permittee shall operate the oxidizers at all times the presses are in operation, maintain the 100 percent capture efficiencies, and demonstrate continuous compliance in accordance with the following:
- (A) The catalytic oxidizing incinerator identified as OXD#1 shall maintain a minimum operating temperature of 650°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain compliance with Conditions D.10.3, and D.10.9(e).

- (B) The catalytic oxidizing incinerators identified as OXD#2 and OXD#3 shall each maintain a minimum operating temperature of 600°F during operation or a temperature that has been determined from the most recent stack test to maintain compliance with Conditions D.10.3, and D.10.9(e).
 - (C) The thermal oxidizing incinerator identified as OXD#4 shall maintain a minimum operating temperature of 1,500°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain compliance with Conditions D.10.3, and D.10.9(e).
 - (D) The catalytic oxidizing incinerator identified as OXD#5 shall maintain a minimum operating temperature of 600°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain compliance with Conditions D.10.3, and D.10.9(e).
- (b) Pursuant to 40 CFR 63.825(e), the Permittee shall calculate the monthly allowable HAP emissions, H_a , as follows:
- (1) Determine the as-purchased mass of each ink, coating, varnish, adhesive, primer, and other solids-containing material applied each month, M_i .
 - (2) Determine the as-purchased solids content of each ink, coating, varnish, adhesive, primer, and other solids-containing material applied each month, in accordance with 40 CFR 63.827(c)(2), C_{si} , and part (a) above.
 - (3) Determine the as-purchased mass fraction of each ink, coating, varnish, adhesive, primer, and other solids-containing material which was applied at 20 weight-percent or greater solids content, on an as-applied basis, G_i .
 - (4) Determine the total mass of each solvent, diluent, thinner, or reducer added to materials which were applied at less than 20 weight-percent solids content, on an as-applied basis, each month, M_{Lj} .
 - (5) Calculate the monthly allowable HAP emissions, H_a , using the following equation:

$$H_a = 0.20 \left[\sum_{i=1}^p M_i G_i C_{si} \right] + 0.04 \left[\sum_{i=1}^p M_i (1 - G_i) + \sum_{j=1}^q M_{Lj} \right]$$

- (c) Pursuant to 40 CFR 63.825(g), the Permittee shall determine the mass of organic HAP emitted using the following procedure:
- (1) Determine the sum of the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on intermittently-controllable work stations in bypass mode and the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on never-controlled work stations during the month, M_{Bi} .

- (2) Determine the sum of the mass of all solvents, reducers, thinners, and other diluents which are applied on intermittently-controllable work stations in bypass mode and the mass of all solvents, reducers, thinners, and other diluents which are applied on never-controlled work stations during the month, M_{Bj} .
- (3) Determine the sum of the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on intermittently-controllable work stations in controlled mode and the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on always-controlled work stations during the month, M_{Ci} .
- (4) Determine the sum of the mass of all solvents, reducers, thinners, and other diluents which are applied on intermittently-controllable work stations in controlled mode and the mass of all solvents, reducers, thinners, and other diluents which are applied on always-controlled work stations during the month, M_{Cj} .
- (5) Calculate the organic HAP emitted during the month using the following equation:

$$H = \left[\sum_{i=1}^p M_{Ci} C_{hi} + \sum_{j=1}^q M_{Cj} C_{hj} \right] * \left[1 - \left(\frac{E}{100} * \frac{F}{100} \right) \right] + \left[\sum_{i=1}^p M_{Bi} C_{hi} + \sum_{j=1}^q M_{Bj} C_{hj} \right]$$

where the symbols of this equation are defined in 40 CFR 63.822 (Definitions).

- (d) Pursuant to 40 CFR 63.827(c)(2), the Permittee shall determine the volatile matter and solids content of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers, diluents, and other materials applied by following the procedure below.
 - (1) The Permittee shall determine the volatile matter and solids weight-fraction of each ink, coating, varnish, adhesive, primer, solvent, reducer, thinner, diluent, and other material applied using Method 24 of 40 CFR part 60, appendix A. The Method 24 determination may be performed by the manufacturer of the material and the results provided to the Permittee.
 - (2) If these values cannot be determined using Method 24, the Permittee shall submit an alternative technique for determining their values for approval by the Administrator.
 - (3) The Permittee may rely on formulation data, subject to the following, in accordance with the provisions of 40 CFR 63.827(c)(3):
 - (A) The Permittee may determine the volatile matter content of materials based on formulation data, and may rely on volatile matter content data provided by material suppliers; and
 - (B) In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR part 60, appendix A, the applicable test method shall govern, unless after consultation, the Permittee can demonstrate to the satisfaction of the enforcement agency

that the formulation data are correct.

- (e) Pursuant to 40 CFR 63.825(d)(1)(xi), the Permittee is in compliance if the oxidizers are operated such that the average combustion temperature or average temperature upstream of the catalyst bed is greater than the operating parameter established in accordance with 40 CFR 63.828(a)(4) and Condition D.10.9 for each three-hour period, and the organic HAP emitted during the month, H , is less than the calculated allowable organic HAP, H_a , as determined using 40 CFR 63.825(e) and Condition D.10.9(b).

D.10.10 Testing Requirements [Agreed Order A-3820]

Pursuant to Agreed Order A-3820, effective November 30, 1998, the Permittee shall conduct annual VOC testing at Presses Nos. 1, 2, 3, and 4 to demonstrate compliance with 326 IAC 8-5-5 and applicable permit conditions. This testing shall be conducted in accordance with the requirements of 326 IAC 3-6, Source Sampling Procedures. The Permittee shall conduct the first of these tests within the fourth quarter of 1999. Subsequent tests shall be conducted during the fourth quarter of each consecutive year. This requirement shall cease after the tests conducted in the fourth quarter 2000 provided that the Permittee demonstrated complete compliance with 326 IAC 8-5-5 and applicable permit conditions during both the 1999 and 2000 tests. The performance of annual VOC testing under this Order shall otherwise satisfy any similar VOC testing requirements imposed on the Permittee under its air permits for the period of the Agreed Order.

D.10.11 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.10.1 and D.10.4 shall be determined pursuant to 326 IAC 8-1-2(a) and 326 IAC 8-1-4(a)(3) using formulation data supplied by the coating manufacturer.

D.10.12 VOC Emissions

Compliance with Condition D.10.4 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the twelve (12) month period.

D.10.13 Volatile Organic Compounds (VOC) Control

- (a) The catalytic and thermal oxidizers controlling VOC emissions from Presses #1 through #4 (emission units P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U8) shall be in operation at all times that these units are in operation to ensure compliance with condition D.10.4.
- (b) The catalytic oxidizing incinerator identified as OXD#1 shall maintain a minimum operating temperature of 650°F during operation or a temperature that has been determined from the most recent compliant stack tests to maintain compliance with condition D.10.4.
- (c) The catalytic oxidizing incinerators identified as OXD#2, and OXD#3 shall each maintain a minimum operating temperature of 600°F during operation or a temperature that has been determined from the most recent compliant stack tests to maintain compliance with condition D.10.4.
- (d) The thermal oxidizing incinerator identified as OXD #4 shall maintain a minimum operating temperature of 1,500°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain compliance with condition D.10.4.

- (e) The catalytic oxidizing incinerator identified as OXD #5 shall maintain a minimum operating temperature of 600°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain compliance with condition D.10.4.

Note: The use of the oxidizers to control VOC emissions from Presses #1 through #4 to comply with the PSD minor VOC emission limitation was voluntarily proposed by the source. Therefore, the source may apply for a modification to remove the requirement to operate the oxidizers at all times that any of the presses are in operation under this Alternative Operating Scenario at any time if compliance with the PSD minor VOC emission limit can be achieved by other means.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.10.14 Monitoring Requirements [326 IAC 8-1-12]

Pursuant to 326 IAC 8-5-5(c)(3)(B) and 326 IAC 8-1-12, the monitoring equipment requirements shall be as follows:

- (a) When the thermal incinerator is used for VOC reduction, a temperature monitoring device capable of continuously recording the temperature of the gas stream in the combustion zone of the incinerator shall be used. The temperature monitoring device shall have an accuracy of one percent (1%) of the temperature being measured in degrees Centigrade, or plus or minus five-tenths degree Centigrade ($\pm 0.5^{\circ}\text{C}$), whichever is more accurate; and
- (b) When a catalytic incinerator is used for VOC reduction, a temperature device capable of continuously recording the temperature in the gas stream immediately before and after the catalyst bed of each incinerator shall be used. The temperature monitoring device shall have an accuracy of one percent (1%) of the temperature being measured in degrees Centigrade, or plus or minus five-tenths degree Centigrade ($\pm 0.5^{\circ}\text{C}$), whichever is more accurate.

D.10.15 Monitoring Requirements [40 CFR 63.828] [326 IAC 20-18-1] [326 IAC 2-4.1]

Pursuant to the Printing and Publishing Industry NESHAP, following the date on which the initial performance test of a control device is completed, to demonstrate continuing compliance with the standard, the Permittee shall monitor and inspect each control device required to comply with Condition D.10.3 to ensure proper operation and maintenance by implementing the following requirements:

- (a) The Permittee shall, for each dryer associated with an intermittently-controllable work station, secure any bypass line valve in the closed position with a car-seal or a lock-and-key type configuration. A visual inspection of the seal or closure mechanism shall be performed at least once every month to ensure that the valve or damper is maintained in the closed position and the exhaust stream is not diverted through the bypass line.
- (b) For the thermal oxidizer, the Permittee shall install, calibrate, operate, and maintain a temperature monitoring device equipped with a continuous recorder. The device shall have an accuracy of ± 1 percent of the temperature being monitored in $^{\circ}\text{C}$ or $\pm 1^{\circ}\text{C}$, whichever is greater. The thermocouple or temperature sensor shall be installed in the combustion chamber at a location in the combustion zone.

- (c) For each catalytic oxidizer, the Permittee shall install, calibrate, operate, and maintain a temperature monitoring device equipped with a continuous recorder. The device shall be capable of monitoring temperature with an accuracy of ± 1 percent of the temperature being monitored in $^{\circ}\text{C}$ or $\pm 1^{\circ}\text{C}$, whichever is greater. The thermocouple or temperature sensor shall be installed in the vent stream at the nearest feasible point to the catalyst bed inlet.
- (d) All temperature monitoring equipment shall be installed, calibrated, maintained, and operated according to manufacturers' specifications. The calibration of the chart recorder, data logger, or temperature indicator shall be verified every three months; or the chart recorder, data logger, or temperature indicator shall be replaced. The replacement shall be done either if the Permittee chooses not to perform the calibration, or if the equipment cannot be calibrated properly.
- (e) Any excursion from the required operating parameters which are monitored in accordance with this condition and Condition D.10.9(c)(4) and (d), unless otherwise excused, shall be considered a violation of Condition D.10.3.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.10.16 Contemporaneous Log for Alternate Operating Scenarios [326 IAC 2-7-5(9)]

- (a) Pursuant to 326 IAC 2-7-5(9)(A), contemporaneously with making a change from one alternative operating scenario to another, the Permittee shall make a record in a log at the permitted facility of the scenario under which it is operating. The record should state the alternative operating scenario for each station, since different stations at the same press may be operating under different scenarios.
- (b) The records required in paragraph (a) of this condition shall be maintained in accordance with the requirements of Condition C.20 and 326 IAC 8-1-9(c).

D.10.17 Record Keeping Requirements [326 IAC 8-1-12]

- (a) Pursuant to 326 IAC 8-1-12(c), upon changing the method of compliance for an existing coating facility from the use of compliant coatings (326 IAC 8-5-5(c)(1), (2), or (4)) to control devices (326 IAC 8-5-5(c)(3)(B)), the Permittee shall collect and record each day and maintain all of the following information for each coating facility:
 - (1) The name and identification of each coating used at each coating facility.
 - (2) The mass of VOC per unit volume of coating solids, as applied, the volume solids content, as applied, and the volume, as applied, of each coating expressed in units necessary to determine compliance, used each day at each coating facility.
 - (3) The maximum VOC content (mass of VOC per unit volume of coating solids, as applied) or the daily weighted average VOC content (mass of VOC per unit volume of coating solids, as applied) of the coatings used each day on each coating facility.
 - (4) The required overall emission reduction efficiency for each day for each coating facility.
 - (5) The actual overall emission reduction efficiency achieved for each day for each coating facility as determined during the compliance test required by Condition

D.10.8 pursuant to 326 IAC 8-1-12(b)(1)(C).

(6) Control device monitoring data as follows:

(A) For the thermal incinerator, the following:

- (i) Continuous records of the temperature in the gas stream in the combustion zone of the incinerator; and
- (ii) Records of all three (3) hour periods of operation in which the average combustion temperature of the gas stream in the combustion zone was more than fifty degrees Fahrenheit (50°F) (twenty-eight degrees Centigrade (28°C)) below the average combustion temperature that existed during the most recent test that demonstrated that the coating facility was in compliance.

(B) For each catalytic incinerator, the following:

- (i) Continuous records of the temperature of the gas stream both upstream and downstream of the catalyst bed of the incinerator;
- (ii) Records of all three (3) hour periods of operation in which the average temperature measured at the process vent stream immediately before the catalyst bed is more than fifty degrees Fahrenheit (50°F) (twenty-eight degrees Centigrade (28°C)) below the average temperature of the process vent stream that existed during the most recent test that demonstrated that the coating facility was in compliance; and
- (iii) Records of all three (3) hour periods of operation in which the average temperature difference across the catalyst bed is less than eighty percent (80%) of the temperature difference measured during the most recent test that demonstrated that the coating facility was in compliance.

(7) A log of operating time for each capture system, control device, monitoring equipment, and the associated coating facility.

(8) A maintenance log for each capture system, control device, and monitoring equipment detailing all routine and nonroutine maintenance performed including dates and duration of any outages.

(b) The records required in paragraph (a) of this condition shall be maintained in accordance with the requirements of Condition C.20 and 326 IAC 8-1-9(c).

~~D.10.18 Record Keeping Requirements [40 CFR 63.829] [326 IAC 20-18-1] [326 IAC 2-4.1]~~

(a) Pursuant to the Printing and Publishing Industry NESHAP, the Permittee shall maintain the following records on a monthly basis:

(1) Records of all measurements needed to demonstrate compliance with Conditions D.10.3 and D.10.6. These records shall include at a minimum the following

specified in 40 CFR 63.10(b)(2) (General Provisions) that are applicable:

- (A) The occurrence and duration of each startup, shutdown, or malfunction of operation (i.e., process equipment);
 - (B) The occurrence and duration of each malfunction of the air pollution control equipment;
 - (C) All maintenance performed on the air pollution control equipment;
 - (D) Actions taken during periods of startup, shutdown, and malfunction (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation) when such actions are different from the procedures specified in the SSM plan required by Condition D.10.6;
 - (E) All information necessary to demonstrate conformance with the SSM plan required in Condition D.10.6 when all actions taken during periods of startup, shutdown, and malfunction (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation) are consistent with the procedures specified in such plan (The information needed to demonstrate conformance with the SSM plan may be recorded using a "checklist", or some other effective form or record keeping, in order to minimize the record keeping burden for conforming events);
 - (F) Each period during which a continuous monitoring system (CMS) is malfunctioning or inoperative (including out-of-control periods);
 - (G) All required measurements needed to demonstrate compliance with Condition D.10.3 (including, but not limited to, 15-minute averages of CMS data, raw performance testing measurements, raw performance evaluation measurements, and control device and capture system operating parameter data, that support data that the source is required to report);
 - (H) All results of performance tests and CMS performance evaluations;
 - (I) All measurements as may be necessary to determine the conditions of performance tests and performance evaluations;
 - (J) All CMS calibration checks;
 - (K) All adjustments and maintenance performed on CMS; and
 - (L) All documentation supporting initial notifications of compliance status under 40 CFR 63.9 (General Provisions).
- (2) Records for each CMS operated by the Permittee in accordance with the requirements of Condition D.10.14. These records are in addition to complying with the requirements specified in paragraph (a)(1) of this condition, and shall include at a minimum the following specified in 40 CFR 63.10(c) (General

Provisions) that are applicable:

- (A) All required CMS measurements (including monitoring data recorded during unavoidable CMS breakdowns and out-of-control periods);
- (B) The date and time identifying each period during which the CMS was inoperative except for zero (low-level) and high-level checks;
- (C) The date and time identifying each period during which the CMS was out of control, as defined in 40 CFR 63.8(c)(7) (General Provisions);
- (D) The specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions and parameter monitoring exceedances, as defined in the rule, that occurs during startups, shutdowns, and malfunctions of the facility;
- (E) The specific identification (i.e., the date and time of commencement and completion) of each time period of excess emissions and parameter monitoring exceedances, as defined in the rule, that occurs during periods other than startups, shutdowns, and malfunctions of the facility;
- (F) The nature and cause of any malfunction (if known);
- (G) The corrective action taken or preventive measures adopted;
- (H) The nature of the repairs or adjustments to the CMS that was inoperative or out of control;
- (I) The total process operating time during the reporting period; and
- (J) All procedures that are part of a quality control program developed and implemented for CMS under 40 CFR 63.8(d) (General Provisions).

In order to satisfy the requirements of paragraphs (F) through (H) of this condition and to avoid duplicative record keeping efforts, the Permittee may use the SSM plan or records kept to satisfy the record keeping requirements of the SSM plan specified in Condition D.10.6, provided that such plan and records adequately address the requirements of paragraphs (F) through (H) of this condition.

- (b) The records required in paragraph (a) of this condition shall be maintained in accordance with the following requirements of 40 CFR 63.10(b)(1) (General Provisions):
 - (1) The Permittee shall maintain files of all information (including all reports and notifications) required by this rule recorded in a form suitable and readily available for expeditious inspection and review.
 - (2) The files shall be retained for at least five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent two years of data shall be retained on site. The remaining three years of data may be retained off site.

- (3) Such files may be maintained on microfilm, on a computer, on computer floppy disks, on magnetic tape disks, or on microfiche.

D.10.19 Record Keeping Requirements

- (a) To document compliance with Condition D.10.4, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limit and/or the VOC emission limit established in Condition D.10.4.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;
 - (2) A log of the dates of use;
 - (3) The total VOC usage for each month at each press while operating the incinerators;
 - (4) The weight of VOCs emitted for each compliance period for each press; and
 - (5) The continuous temperature records for the catalytic and thermal incinerators and the temperature used to demonstrate compliance during the most recent compliance stack test.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.10.20 Record Keeping Requirements [Agreed Order A-3820]

Pursuant to Agreed Order #A-3820, effective November 30, 1998, for a period of four (4) years, the Permittee shall maintain, and provide upon request, a record of all times that an incinerator is overloaded or shuts down and results in the triggering of the automatic press shut-off. This record should include the dates, times, and the presses and incinerators involved in each of these incidents.

D.10.21 Reporting Requirements [326 IAC 8-1-12]

Pursuant to 326 IAC 8-5-5(c)(3)(B) and 326 IAC 8-1-12, the Permittee shall notify IDEM, OAQ in either of the following instances:

- (a) Any record showing noncompliance with the applicable requirements for control devices shall be reported by submitting a copy of the record to IDEM, OAQ within thirty (30) days following noncompliance; such record shall also be submitted with the quarterly compliance monitoring report attached to this permit. The following information shall accompany each submittal:
 - (1) Name and location of the coating facility;
 - (2) Identification of the control system where the noncompliance occurred and the coating facility it served;
 - (3) Time, date and duration of the noncompliance; and

- (4) Corrective action taken.
- (b) At least thirty (30) calendar days before changing the method of compliance from control devices (326 IAC 8-5-5(c)(3)(B)) to the use of compliant coatings (326 IAC 8-5-5(c)(1), (2), or (4)), the Permittee shall comply with all applicable requirements of 326 IAC 8-1-10(b). Upon changing the method of compliance from control devices to the use of compliant coatings, the Permittee shall comply with all requirements of 326 IAC 8-1-10(b), applicable to the coating facility subject to 326 IAC 8-5-5.

D.10.22 Reporting Requirements

- (a) A quarterly summary of the information to document compliance with Condition D.10.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. This quarterly summary report can be submitted in the same summary report required for Alternative Operating Scenarios 1 through 9 in Conditions D.1.17(a), D.2.17(a), D.3.17(a), D.4.17(a), D.5.17(a), D.6.17(a), D.7.21(a), D.8.21(a), and D.9.21(a). The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) Pursuant to 326 IAC 2-7-5(9)(C), the Permittee shall include a summary of the records required under Condition D.10.15 in the annual compliance certification submitted under 326 IAC 2-7-6(5) and Condition B.11.

D.10.23 Reporting Requirements [40CFR 63.830] [326 IAC 20-18-1] [326 IAC 2-4.1]

Pursuant to the Printing and Publishing Industry NESHAP, the Permittee shall submit the reports and plans listed below to the following addresses:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (a) A Notification of Performance Tests specified in 40 CFR 63.7 and 63.9(e) (General Provisions). This notification, and the site-specific test plan required under 40 CFR 63.7(c)(2) (General Provisions) shall identify the operating parameter to be monitored to ensure that the capture efficiency measured during the performance test is maintained. The operating parameter identified in the site-specific test plan shall be considered to be approved unless explicitly disapproved, or unless comments received from IDEM, OAQ require monitoring of an alternate parameter.
- (b) A Notification of Compliance Status specified in 40 CFR 63.9(h) (General Provisions). This notification can be submitted in the same notification required for Alternative Operating Scenarios 1 through 9 in Conditions D.1.18(a), D.2.18(a), D.3.18(a), D.4.18(a), D.5.18(a), D.6.18(a), D.7.22(b), D.8.22(b), and D.9.22(b).

- (c) Performance test reports specified in 40 CFR 63.10(d)(2) (General Provisions).
- (d) Start-up, shutdown and malfunction (SSM) reports specified in 40 CFR 63.10(d)(5) (General Provisions).
 - (1) If actions taken by the Permittee during a start-up, shutdown, or malfunction of the facility (including actions taken to correct a malfunction) are not completely consistent with the procedures specified in the facility's SSM plan specified in Condition D.10.6, the Permittee shall report the actions taken for that event in strict accordance with 40 CFR 63.10(d)(5)(ii), i.e., within two (2) working days after commencing actions inconsistent with the plan, followed by a letter within seven (7) working days after the end of the event. The SSM report shall consist of a letter containing the name, title, and signature of the responsible official who is certifying its accuracy; shall be submitted to IDEM, OAQ; and shall otherwise comply with the provisions of 40 CFR 63.10(d)(5)(ii).
 - (2) Separate start-up, shutdown, or malfunction reports are not required if the information is included in the report specified in paragraph (e) of this condition.
- (e) A summary report specified in 40 CFR 63.10(e)(3) (General Provisions) shall be submitted on a semi-annual basis (i.e., once every six-month period). In addition to a report of operating parameter exceedances as required by 40 CFR 63.10(e)(3)(i) (General Provisions), the summary report shall include exceedances of the standards in Condition D.10.3. This summary report can be submitted in the same summary report required for Alternative Operating Scenarios 1 through 9 in Conditions D.1.18(b), D.2.18(b), D.3.18(b), D.4.18(b), D.5.18(b), D.6.18(b), D.7.22(e), D.8.22(e), and D.9.22(e).

SECTION D.11 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (1) one (1) mechanical spray cold cleaner degreaser, identified as PW1, constructed in June of 1990, with a solvent consumption rate of thirty-three (33) gallons per day, utilizing closed-loop solvent recycling and distillation for VOC emissions control, and exhausting through one (1) stack (S/V ID: S-MR1);
- (2) one (1) mechanical spray cold cleaner degreaser, identified as PW2, with a projected solvent consumption rate of four (4) gallons per day, utilizing closed-loop solvent recycling and distillation for VOC emissions control, and exhausting through one (1) stack (S/V ID: S-MR1); and
- (3) one (1) immersion and mechanical spray cold cleaner degreaser, identified as SD1, constructed in September of 1993, with a solvent consumption rate of fourteen (14) gallons per day, equipped with cover for VOC emissions control, and exhausting through one (1) stack (S/V ID: S-MR1).

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.11.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations) for cold cleaning operations constructed after January 1, 1980, the owner or operator of PW1 shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.11.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

The cold cleaner degreasing operations PW2 and SD1 are subject to this rule. These degreasing operations shall comply with the following requirements.

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility construction of which commenced after July 1, 1990, shall ensure that the following control equipment requirements are met:
 - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));

- (B) The solvent is agitated; or
 - (C) The solvent is heated.
- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:
 - (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

D.11.3 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

The source wishes to limit the source-wide potential to emit VOC, to less than 250 tons per year to become a minor source under 326 IAC 2-2 (PSD) and 40 CFR 52.21. The following limits shall enable the source to achieve this status:

- (a) The total VOC consumption in parts washer PW1 shall be limited to seventy five (75) tons per twelve (12) consecutive month period, rolled on a monthly basis. The exhaust from PW1 shall be directed to either OXD#3, OXD#4 or a combination of OXD#3 and OXD#4 operating in parallel at all times PW1 is in operation in order to control VOC emissions. The capture and incineration system that is used to control VOC emissions from PW1 shall achieve a minimum overall VOC control efficiency of 84.7%. This usage limitation will then be equivalent to a VOC emission limitation of 11.5 tons per twelve (12) consecutive month period.
- (b) The total VOC consumption in parts washer PW2 shall be limited to six (6) tons per twelve (12) consecutive month period, rolled on a monthly basis.
- (c) The total VOC consumption in degreaser SD1 shall be limited to ten (10) tons per twelve (12) consecutive month period, rolled on a monthly basis.

The above emission limits including VOC emissions from natural gas combustion, the printing operations, and the insignificant activities will limit source wide VOC emissions to less than 250 tons per year.

D.11.4 Halogenated Solvent Cleaning [40 CFR 63, Subpart T] [326 IAC 20]

The cold cleaner degreasing facilities PW1, PW2, and SD1 shall not utilize any of the halogenated solvents (methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride, or chloroform), or any combination of these halogenated HAP solvents in a total concentration greater than five (5%) percent by weight.

D.11.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.11.6 Volatile Organic Compounds (VOC) Control

- (a) The catalytic and thermal oxidizers controlling VOC emissions from parts washer PW1 shall be in operation at all times that this unit is in operation to ensure compliance with condition D.11.3(a).
- (b) The catalytic oxidizing incinerator identified as OXD#3 shall maintain a minimum operating temperature of 600°F during operation or a temperature that has been determined from the most recent compliant stack tests to maintain compliance with condition D.11.3(a).
- (c) The thermal oxidizing incinerator identified as OXD #4 shall maintain a minimum operating temperature of 1,500°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain compliance with condition D.11.3(a).

D.11.7 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.11.3 and D.11.4 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

D.11.8 VOC Emissions

Compliance with Condition D.11.3 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the twelve (12) month period.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.11.9 Record Keeping Requirement

- (a) To document compliance with Conditions D.11.3 and D.11.4, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.11.3 and D.11.4
- (1) The amount and VOC and HAP content of each solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC usage in each of parts washer PW1, parts washer PW2, and degreaser SD1 for each month;
 - (5) The weight of VOC emitted for each compliance period; and
 - (6) The continuous temperature records for the catalytic and thermal incinerators controlling parts washer PW1 and the temperature used to demonstrate compliance during the most recent compliance stack test.
- (b) These records shall be maintained in accordance with Section C - General Record Keeping Requirements.

D.11.10 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.11.3 shall be submitted to the address listed in Section C - General Reporting Requirements, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.12 FACILITY CONDITIONS

Facility Description [326 IAC 2-7-5(15)] - The following degreasing operation

- (1) one (1) mechanical spray cold cleaner degreaser, identified as PW2, with a projected solvent consumption rate of four (4) gallons per day, utilizing closed-loop solvent recycling and distillation for VOC emissions control, and exhausting through one (1) stack (S/V ID: S-MR1).
(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

Construction Conditions [326 IAC 2-1-3.2]

General Construction Conditions

D.12.1 This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

Effective Date of the Permit

D.12.2 Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.

D.12.3 Pursuant to 326 IAC 2-1-9(b) (Revocation of Permits), IDEM, OAQ, may revoke this section of the approved permit if construction is not commenced within eighteen (18) months after receipt of this permit or if construction is suspended for a continuous period of one (1) year or more.

D.12.4 All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

First Time Operation Permit

D.12.5 This document shall also become the first-time operation permit for the facilities under this section of this permit, pursuant to 326 IAC 2-1-4 (Operating Permits) when, prior to start of operation, the following requirements are met:

- (a) The attached affidavit of construction shall be submitted to:

Indiana Department of Environmental Management
Permit Administration & Development Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

verifying that the facilities were constructed as proposed in the application. The facilities covered in this section of this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.

- (b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.
- (c) The permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section and attach it to this permit.

Operation Conditions

See Section D.11 for Operation Conditions

SECTION D.13

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] - The following insignificant activities

- (a) one (1) natural gas fired hot oil boiler identified as TH1 used to heat Press #3, rated at 6 MMBtu per hour and exhausting through one (1) stack identified as S004.
- (e) One (1) Offset Gravure Coater station with an Electron Beam Curing Unit, with a maximum line speed of 1000 feet per minute and a printing width of 42 inches with maximum coverage of 4.74 pounds per million square inches.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.13.1 Particulate Matter (PM) [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-3 (Particulate Matter Emission Limitations for Sources of Indirect Heating, the PM emissions from the 6.0 MMBtu per hour heat input boiler shall be limited to 0.6 pounds per MMBtu heat input.

D.13.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-5]

Pursuant to 326 IAC 8-2-5 (Surface Coating Emission Limitations: Paper Coating Operations), the Permittee may not cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of two and nine tenths (2.9) pounds per gallon excluding water, delivered to the coating applicator from a label coating line.

D.13.3 Volatile Organic Compounds (VOC) [326 IAC 7-2-10.5]

Any change or modification to the Offset Gravure Coater station that may increase the VOC emissions to 15 pounds per day or more must be approved by OAQ before the change can take place.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Multi-Color Corporation
Source Address: 2281 South U.S. 31, Scottsburg, IN 47170
Mailing Address: 2281 South U.S. 31, Scottsburg, IN 47170
Part 70 Permit No.: T143-9310-00007

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Affidavit (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Multi-Color Corporation
Source Address: 2281 South U.S. 31, Scottsburg, IN 47170
Mailing Address: 2281 South U.S. 31, Scottsburg, IN 47170
Part 70 Permit No.: T143-9310-00007

This form consists of 2 pages

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This is an emergency as defined in 326 IAC 2-7-1(12)

- ☒ The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
- ☒ The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Multi-Color Corporation
Source Address: 2281 South U.S. 31, Scottsburg, IN 47170
Mailing Address: 2281 South U.S. 31, Scottsburg, IN 47170
Part 70 Permit No.: T143-9310-00007
Facility: Presses #1 - #4 emission units P1U1-10, P2U1-9, P3U1-8, and P4U1-8
Parameter: volatile organic compounds (VOC)
Limit: The total input VOC, including coatings, dilution solvents, and cleaning solvents, to Presses #1 through #4 (emission units P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U8) shall be limited to 3,458 tons per twelve (12) consecutive month period. VOC emissions from each press shall be controlled by a capture and incineration system that achieves a minimum overall VOC control efficiency of 94%.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Usage This Month (tons)	VOC Usage Previous 11 Months (tons)	12 Month Total VOC Usage (tons)

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____

Multi-Color Corporation
Scottsburg, Indiana
Permit Reviewer: TE/EVP

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OP No. T143-9310-00007

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Multi-Color Corporation
Source Address: 2281 South U.S. 31, Scottsburg, IN 47170
Mailing Address: 2281 South U.S. 31, Scottsburg, IN 47170
Part 70 Permit No.: T143-9310-00007
Facility: Parts Washer PW1
Parameter: volatile organic compounds (VOC)
Limit: The total VOC consumption in parts washer PW1 shall be limited to seventy five (75) tons per twelve (12) consecutive month period, rolled on a monthly basis. The exhaust from PW1 shall be directed to either OXD#3, OXD#4 or a combination of OXD#3 and OXD#4 operating in parallel at all times PW1 is in operation in order to control VOC emissions. The capture and incineration system that is used to control VOC emissions from PW1 shall achieve a minimum overall VOC control efficiency of 84.7%. This usage limitation will then be equivalent to a VOC emission limitation of 11.5 tons per twelve (12) consecutive month period.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Consumed This Month (tons)	VOC Consumed Previous 11 Months (tons)	12 Month Total VOC Consumed (tons)

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Multi-Color Corporation
Source Address: 2281 South U.S. 31, Scottsburg, IN 47170
Mailing Address: 2281 South U.S. 31, Scottsburg, IN 47170
Part 70 Permit No.: T143-9310-00007
Facility: Parts Washer PW2
Parameter: volatile organic compounds (VOC)
Limit: The total VOC consumption in parts washer PW2 shall be limited to six (6) tons per twelve (12) consecutive month period, rolled on a monthly basis.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Consumed This Month (tons)	VOC Consumed Previous 11 Months (tons)	12 Month Total VOC Consumed (tons)

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Multi-Color Corporation
Source Address: 2281 South U.S. 31, Scottsburg, IN 47170
Mailing Address: 2281 South U.S. 31, Scottsburg, IN 47170
Part 70 Permit No.: T143-9310-00007
Facility: Degreaser SD1
Parameter: volatile organic compounds (VOC)
Limit: The total VOC consumption in degreaser SD1 shall be limited to ten (10) tons per twelve (12) consecutive month period, rolled on a monthly basis.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Consumed This Month (tons)	VOC Consumed Previous 11 Months (tons)	12 Month Total VOC Consumed (tons)

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
QUARTERLY DEVIATION and COMPLIANCE MONITORING REPORT**

Source Name: Multi-Color Corporation
Source Address: 2281 South U.S. 31, Scottsburg, IN 47170
Mailing Address: 2281 South U.S. 31, Scottsburg, IN 47170
Part 70 Permit No.: T143-9310-00007

Months: _____ to _____ Year: _____

Page 1 of 2

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviation that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document for a Part 70 Operating Permit

Source Name: Multi-Color Corporation
 Source Location: 2281 South U.S. 31, Scottsburg, Indiana 47170
 County: Scott
 SIC Code: 2754
 Operation Permit No.: T143-9310-00007
 Permit Reviewer: Trish Earls/EVP

On January 27, 2001, the Office of Air Quality (OAQ) had a notice published in the Scott County Journal, Scottsburg, Indiana, stating that Multi-Color Corporation had applied for a Part 70 Operating Permit to operate a packaging rotogravure printing operation. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. This was the second time that the proposed permit was public noticed due to a change in rule applicability and the addition of alternative operating scenarios. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On March 1, 2001, Walter Bowles of Webco Environmental Management, Inc. submitted comments on behalf of Multi-Color Corporation. The summary of the comments and responses is as follows:

Comment #1

Section A.1 - The responsible official is John P. McKeough, Vice President of Operations.

Response #1

Section A.1 is revised so that the responsible official is changed to John P. McKeough, Vice President of Operations, as follows:

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]
 The Permittee owns and operates a stationary packaging rotogravure printing source.

Responsible Official:	Francis D. Gerace John P. McKeough, Vice President of Operations
Source Address:	2281 South U.S. 31, Scottsburg, Indiana 47170
Mailing Address:	2281 South U.S. 31, Scottsburg, Indiana 47170
SIC Code:	2754
County Location:	Scott
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

Comment #2

Section A.2(5), (6), and (7): The exhausts from emission units PW1, PW2, and SD1 discharge through stack S/V ID S-MR1.

Response #2

Item (7) of section A.2 already lists the correct stack id for emission unit SD1. Items (5) and (6) of section A.2 are revised to read as follows:

- (5) one (1) mechanical spray cold cleaner degreaser, identified as PW1, constructed in June of 1990, with a solvent consumption rate of thirty-three (33) gallons per day, utilizing closed-loop solvent recycling and distillation for VOC emissions control, and exhausting through one (1) stack (S/V ID: ~~S-PW1~~**MR1**);
- (6) one (1) mechanical spray cold cleaner degreaser, identified as PW2, with a projected solvent consumption rate of four (4) gallons per day, utilizing closed-loop solvent recycling and distillation for VOC emissions control, and exhausting through one (1) stack (S/V ID: ~~S-PW2~~**MR1**); and

The same change has been made to the equipment descriptions listed in sections D.11 and D.12.

Comment #3

Section B.13 (c) (1): This condition should be revised since the draft permit does not provide an option for the applicant to comply with 326 IAC 8-5-5 by using water based materials in lieu of the use of VOC control equipment;

Response #3

The permit does provide provisions for using compliant coatings for 326 IAC 8-5-5 in sections D.1 through D.6. Although operating conditions in sections D.1 through D.6 require the use of controls for VOC emissions, they are only required to comply with the PSD minor limit and are not required for compliance with 326 IAC 8-5-5 or 40 CFR Part 63, Subpart KK. Therefore, condition B.13 remains unchanged since the permit does not require controls to comply with 326 IAC 8-5-5 when using water based or compliant coatings.

Comment #4

Section D.7, Facility Description (1): This press may also be controlled by oxidizer OXD#1 or the combination of oxidizers operating in parallel as OXD#1 and OXD#2 as a control option. This description should be revised to be the same as that found in section D.8 Facility Description (1).

Response #4

This was a typographical error in section D.7. Item (1) of the facility descriptions has been corrected to read as follows:

- (1) one (1) ten (10) station packaging rotogravure printing press identified as Press #1 (ten stations: P1U1 through P1U10), constructed in May of 1990, with a maximum line speed of 840 feet per minute (ft/min) when printing with ink and 740 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system with a total heat input rate of 7.76 million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) emissions from P1U1-P1U10 are controlled by one of the following:
- (a) **a single catalytic oxidizing incinerator identified as OXD#1 exhausting through one (1) stack (S/V ID: S-OXD1); or**
 - (b) a single catalytic oxidizing incinerator identified as OXD#2 exhausting through one (1) stack (S/V ID: S-OXD2); or
 - (c) **two (2) catalytic oxidizing incinerators configured in parallel, respectively identified as OXD#1 and OXD#2, with each incinerator exhausting through one (1) stack (S/V ID: S-OXD1 and S-OXD2), respectively.**

Comment #5

Condition D.7.9 (a)(4): OXD#1 should be added as an available control device.

Response #5

The operating parameters for OXD#1 were erroneously left out of condition D.7.9 in the draft permit. Therefore, condition D.7.9(a)(4) is revised to read as follows:

- (4) Based on stack tests conducted in November and December of 1999 and June of 2000, the Permittee shall operate the oxidizers at all times the presses are in operation, maintain the 100 percent capture efficiencies, and demonstrate continuous compliance in accordance with the following:
- (A) The catalytic oxidizing incinerator identified as OXD#1 shall maintain a minimum operating temperature of 650°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain compliance with Conditions D.7.3, and D.7.9(c).**
 - ~~(A)~~**(B)** The catalytic oxidizing incinerators identified as OXD#2 and OXD#3 shall each maintain a minimum operating temperature of 600°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain compliance with Conditions D.7.3, and D.7.9(c).
 - ~~(B)~~**(C)** The thermal oxidizing incinerator identified as OXD#4 shall maintain a minimum operating temperature of 1,500°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain compliance with Conditions D.7.3, and D.7.9(c).
 - ~~(C)~~**(D)** The catalytic oxidizing incinerator identified as OXD#5 shall maintain a minimum operating temperature of 600°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain compliance with Conditions D.7.3, and D.7.9(c).

Comment #6

Conditions D.1.10, D.2.10, D.3.10, D.4.10, D.5.10, D.6.10, D.7.13, D.8.13, and D.10.13: Remove the references to maintaining "fan amperage" since this parameter is not required to be monitored in order to demonstrate capture efficiency for the total enclosures. In addition, IDEM's compliance data section did not require monitoring of this parameter during previous stack tests. Further, stack testing occurs under essentially maximum loading to the oxidizer which translates into maximum air flow to the oxidizer. During regular operation, air flows from the press may be less (due to situations where only certain units on the press are operated) which will result in an air flow to the oxidizer which is less than the air flow measured during a stack test;

Response #6

The OAQ has determined that monitoring of fan amperage is not necessary to demonstrate compliance with the overall control efficiency required to comply with the PSD minor VOC limit. This parameter is not required to be monitored by 326 IAC 8-5-5 or 40 CFR 63, Subpart KK and it was not required to be monitored in any of the past construction permits issued to the source. Therefore, conditions D.1.10, D.2.10, D.3.10, D.4.10, D.5.10, D.6.10, D.7.13, D.8.13, and D.10.13 are revised to read as follows:

D.1.10 Volatile Organic Compounds (VOC) Control

-
- (a) The catalytic and thermal oxidizers controlling VOC emissions from Presses #1 through #4 (emission units P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U8) shall be in operation at all times that these units are in operation to ensure compliance with condition D.1.4.
 - (b) The catalytic oxidizing incinerator identified as OXD#1 shall maintain a minimum operating temperature of 650°F during operation or a temperature ~~and fan amperage~~ that has been determined from the most recent compliant stack tests to maintain a minimum 94% destruction of the nonmethane VOC captured.
 - (c) The catalytic oxidizing incinerators identified as OXD#2, and OXD#3 shall each maintain a minimum operating temperature of 600°F during operation or a temperature ~~and fan amperage~~ that has been determined from the most recent compliant stack tests to maintain a minimum 94% destruction of the nonmethane VOC captured.
 - (d) The thermal oxidizing incinerator identified as OXD #4 shall maintain a minimum operating temperature of 1,500°F during operation or a temperature ~~and fan amperage~~ that has been determined from the most recent compliant stack test to maintain a minimum 94% destruction of the nonmethane VOC captured.
 - (e) The catalytic oxidizing incinerator identified as OXD #5 shall maintain a minimum operating temperature of 600°F during operation or a temperature ~~and fan amperage~~ that has been determined from the most recent compliant stack test to maintain a minimum 94% destruction of the nonmethane VOC captured.

Note: The use of the oxidizers to control VOC emissions from Presses #1 through #4 to comply with the PSD minor VOC emission limitation was voluntarily proposed by the source. Therefore, the source may apply for a modification to remove the requirement to operate

the oxidizers at all times that any of the presses are in operation under this Alternative Operating Scenario at any time if compliance with the PSD minor VOC emission limit can be achieved by other means.

D.2.10 Volatile Organic Compounds (VOC) Control

- (a) The catalytic and thermal oxidizers controlling VOC emissions from Presses #1 through #4 (emission units P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U8) shall be in operation at all times that these units are in operation to ensure compliance with condition D.2.4.
- (b) The catalytic oxidizing incinerator identified as OXD#1 shall maintain a minimum operating temperature of 650°F during operation or a temperature ~~and fan amperage~~ that has been determined from the most recent compliant stack tests to maintain a minimum 94% destruction of the nonmethane VOC captured.
- (c) The catalytic oxidizing incinerators identified as OXD#2, and OXD#3 shall each maintain a minimum operating temperature of 600°F during operation or a temperature ~~and fan amperage~~ that has been determined from the most recent compliant stack tests to maintain a minimum 94% destruction of the nonmethane VOC captured.
- (d) The thermal oxidizing incinerator identified as OXD#4 shall maintain a minimum operating temperature of 1,500°F during operation or a temperature ~~and fan amperage~~ that has been determined from the most recent compliant stack test to maintain a minimum 94% destruction of the nonmethane VOC captured.
- (e) The catalytic oxidizing incinerator identified as OXD#5 shall maintain a minimum operating temperature of 600°F during operation or a temperature ~~and fan amperage~~ that has been determined from the most recent compliant stack test to maintain a minimum 94% destruction of the nonmethane VOC captured.

Note: The use of the oxidizers to control VOC emissions from Presses #1 through #4 to comply with the PSD minor VOC emission limitation was voluntarily proposed by the source. Therefore, the source may apply for a modification to remove the requirement to operate the oxidizers at all times that any of the presses are in operation under this Alternative Operating Scenario at any time if compliance with the PSD minor VOC emission limit can be achieved by other means.

D.3.10 Volatile Organic Compounds (VOC) Control

- (a) The catalytic and thermal oxidizers controlling VOC emissions from Presses #1 through #4 (emission units P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U8) shall be in operation at all times that these units are in operation to ensure compliance with condition D.3.4.
- (b) The catalytic oxidizing incinerator identified as OXD#1 shall maintain a minimum operating temperature of 650°F during operation or a temperature ~~and fan amperage~~ that has been determined from the most recent compliant stack tests to maintain a minimum 94% destruction of the nonmethane VOC captured.

- (c) The catalytic oxidizing incinerators identified as OXD#2, and OXD#3 shall each maintain a minimum operating temperature of 600°F during operation or a temperature ~~and fan amperage~~ that has been determined from the most recent compliant stack tests to maintain a minimum 94% destruction of the nonmethane VOC captured.
- (d) The thermal oxidizing incinerator identified as OXD #4 shall maintain a minimum operating temperature of 1,500°F during operation or a temperature ~~and fan amperage~~ that has been determined from the most recent compliant stack test to maintain a minimum 94% destruction of the nonmethane VOC captured.
- (e) The catalytic oxidizing incinerator identified as OXD #5 shall maintain a minimum operating temperature of 600°F during operation or a temperature ~~and fan amperage~~ that has been determined from the most recent compliant stack test to maintain a minimum 94% destruction of the nonmethane VOC captured.

Note: The use of the oxidizers to control VOC emissions from Presses #1 through #4 to comply with the PSD minor VOC emission limitation was voluntarily proposed by the source. Therefore, the source may apply for a modification to remove the requirement to operate the oxidizers at all times that any of the presses are in operation under this Alternative Operating Scenario at any time if compliance with the PSD minor VOC emission limit can be achieved by other means.

D.4.10 Volatile Organic Compounds (VOC) Control

- (a) The catalytic and thermal oxidizers controlling VOC emissions from Presses #1 through #4 (emission units P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U8) shall be in operation at all times that these units are in operation to ensure compliance with condition D.4.4.
- (b) The catalytic oxidizing incinerator identified as OXD#1 shall maintain a minimum operating temperature of 650°F during operation or a temperature ~~and fan amperage~~ that has been determined from the most recent compliant stack tests to maintain a minimum 94% destruction of the nonmethane VOC captured.
- (c) The catalytic oxidizing incinerators identified as OXD#2, and OXD#3 shall each maintain a minimum operating temperature of 600°F during operation or a temperature ~~and fan amperage~~ that has been determined from the most recent compliant stack tests to maintain a minimum 94% destruction of the nonmethane VOC captured.
- (d) The thermal oxidizing incinerator identified as OXD #4 shall maintain a minimum operating temperature of 1,500°F during operation or a temperature ~~and fan amperage~~ that has been determined from the most recent compliant stack test to maintain a minimum 94% destruction of the nonmethane VOC captured.
- (e) The catalytic oxidizing incinerator identified as OXD #5 shall maintain a minimum operating temperature of 600°F during operation or a temperature ~~and fan amperage~~ that has been determined from the most recent compliant stack test to maintain a minimum 94% destruction of the nonmethane VOC captured.

Note: The use of the oxidizers to control VOC emissions from Presses #1 through #4 to comply with the PSD minor VOC emission limitation was voluntarily proposed by the source. Therefore, the source may apply for a modification to remove the requirement to operate the oxidizers at all times that any of the presses are in operation under this Alternative Operating Scenario at any time if compliance with the PSD minor VOC emission limit can be achieved by other means.

D.5.10 Volatile Organic Compounds (VOC) Control

- (a) The catalytic and thermal oxidizers controlling VOC emissions from Presses #1 through #4 (emission units P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U8) shall be in operation at all times that these units are in operation to ensure compliance with condition D.5.4.
- (b) The catalytic oxidizing incinerator identified as OXD#1 shall maintain a minimum operating temperature of 650°F during operation or a temperature ~~and fan amperage~~ that has been determined from the most recent compliant stack tests to maintain a minimum 94% destruction of the nonmethane VOC captured.
- (c) The catalytic oxidizing incinerators identified as OXD#2, and OXD#3 shall each maintain a minimum operating temperature of 600°F during operation or a temperature ~~and fan amperage~~ that has been determined from the most recent compliant stack tests to maintain a minimum 94% destruction of the nonmethane VOC captured.
- (d) The thermal oxidizing incinerator identified as OXD #4 shall maintain a minimum operating temperature of 1,500°F during operation or a temperature ~~and fan amperage~~ that has been determined from the most recent compliant stack test to maintain a minimum 94% destruction of the nonmethane VOC captured.
- (e) The catalytic oxidizing incinerator identified as OXD #5 shall maintain a minimum operating temperature of 600°F during operation or a temperature ~~and fan amperage~~ that has been determined from the most recent compliant stack test to maintain a minimum 94% destruction of the nonmethane VOC captured.

Note: The use of the oxidizers to control VOC emissions from Presses #1 through #4 to comply with the PSD minor VOC emission limitation was voluntarily proposed by the source. Therefore, the source may apply for a modification to remove the requirement to operate the oxidizers at all times that any of the presses are in operation under this Alternative Operating Scenario at any time if compliance with the PSD minor VOC emission limit can be achieved by other means.

D.6.10 Volatile Organic Compounds (VOC) Control

- (a) The catalytic and thermal oxidizers controlling VOC emissions from Presses #1 through #4 (emission units P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U8) shall be in operation at all times that these units are in operation to ensure compliance with condition D.6.4.
- (b) The catalytic oxidizing incinerator identified as OXD#1 shall maintain a minimum operating

temperature of 650°F during operation or a temperature ~~and fan amperage~~ that has been determined from the most recent compliant stack tests to maintain a minimum 94% destruction of the nonmethane VOC captured.

- (c) The catalytic oxidizing incinerators identified as OXD#2, and OXD#3 shall each maintain a minimum operating temperature of 600°F during operation or a temperature ~~and fan amperage~~ that has been determined from the most recent compliant stack tests to maintain a minimum 94% destruction of the nonmethane VOC captured.
- (d) The thermal oxidizing incinerator identified as OXD #4 shall maintain a minimum operating temperature of 1,500°F during operation or a temperature ~~and fan amperage~~ that has been determined from the most recent compliant stack test to maintain a minimum 94% destruction of the nonmethane VOC captured.
- (e) The catalytic oxidizing incinerator identified as OXD #5 shall maintain a minimum operating temperature of 600°F during operation or a temperature ~~and fan amperage~~ that has been determined from the most recent compliant stack test to maintain a minimum 94% destruction of the nonmethane VOC captured.

Note: The use of the oxidizers to control VOC emissions from Presses #1 through #4 to comply with the PSD minor VOC emission limitation was voluntarily proposed by the source. Therefore, the source may apply for a modification to remove the requirement to operate the oxidizers at all times that any of the presses are in operation under this Alternative Operating Scenario at any time if compliance with the PSD minor VOC emission limit can be achieved by other means.

D.7.13 Volatile Organic Compounds (VOC) Control

- (a) The catalytic and thermal oxidizers controlling VOC emissions from Presses #1 through #4 (emission units P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U8) shall be in operation at all times that these units are in operation to ensure compliance with condition D.7.4.
- (b) The catalytic oxidizing incinerator identified as OXD#1 shall maintain a minimum operating temperature of 650°F during operation or a temperature ~~and fan amperage~~ that has been determined from the most recent compliant stack tests to maintain a minimum 94% destruction of the nonmethane VOC captured.
- (c) The catalytic oxidizing incinerators identified as OXD#2, and OXD#3 shall each maintain a minimum operating temperature of 600°F during operation or a temperature ~~and fan amperage~~ that has been determined from the most recent compliant stack tests to maintain a minimum 94% destruction of the nonmethane VOC captured.
- (d) The thermal oxidizing incinerator identified as OXD #4 shall maintain a minimum operating temperature of 1,500°F during operation or a temperature ~~and fan amperage~~ that has been determined from the most recent compliant stack test to maintain a minimum 94% destruction of the nonmethane VOC captured.

- (e) The catalytic oxidizing incinerator identified as OXD #5 shall maintain a minimum operating temperature of 600°F during operation or a temperature ~~and fan amperage~~ that has been determined from the most recent compliant stack test to maintain a minimum 94% destruction of the nonmethane VOC captured.

Note: The use of the oxidizers to control VOC emissions from Presses #1 through #4 to comply with the PSD minor VOC emission limitation was voluntarily proposed by the source. Therefore, the source may apply for a modification to remove the requirement to operate the oxidizers at all times that any of the presses are in operation under this Alternative Operating Scenario at any time if compliance with the PSD minor VOC emission limit can be achieved by other means.

D.8.13 Volatile Organic Compounds (VOC) Control

- (a) The catalytic and thermal oxidizers controlling VOC emissions from Presses #1 through #4 (emission units P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U8) shall be in operation at all times that these units are in operation to ensure compliance with condition D.8.4.
- (b) The catalytic oxidizing incinerator identified as OXD#1 shall maintain a minimum operating temperature of 650°F during operation or a temperature ~~and fan amperage~~ that has been determined from the most recent compliant stack tests to maintain a minimum 94% destruction of the nonmethane VOC captured.
- (c) The catalytic oxidizing incinerators identified as OXD#2, and OXD#3 shall each maintain a minimum operating temperature of 600°F during operation or a temperature ~~and fan amperage~~ that has been determined from the most recent compliant stack tests to maintain a minimum 94% destruction of the nonmethane VOC captured.
- (d) The thermal oxidizing incinerator identified as OXD #4 shall maintain a minimum operating temperature of 1,500°F during operation or a temperature ~~and fan amperage~~ that has been determined from the most recent compliant stack test to maintain a minimum 94% destruction of the nonmethane VOC captured.
- (e) The catalytic oxidizing incinerator identified as OXD #5 shall maintain a minimum operating temperature of 600°F during operation or a temperature ~~and fan amperage~~ that has been determined from the most recent compliant stack test to maintain a minimum 94% destruction of the nonmethane VOC captured.

Note: The use of the oxidizers to control VOC emissions from Presses #1 through #4 to comply with the PSD minor VOC emission limitation was voluntarily proposed by the source. Therefore, the source may apply for a modification to remove the requirement to operate the oxidizers at all times that any of the presses are in operation under this Alternative Operating Scenario at any time if compliance with the PSD minor VOC emission limit can be achieved by other means.

D.10.13 Volatile Organic Compounds (VOC) Control

- (a) The catalytic and thermal oxidizers controlling VOC emissions from Presses #1 through #4

(emission units P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U8) shall be in operation at all times that these units are in operation to ensure compliance with condition D.10.4.

- (b) The catalytic oxidizing incinerator identified as OXD#1 shall maintain a minimum operating temperature of 650°F during operation or a temperature ~~and fan amperage~~ that has been determined from the most recent compliant stack tests to maintain a minimum 94% destruction of the nonmethane VOC captured.
- (c) The catalytic oxidizing incinerators identified as OXD#2, and OXD#3 shall each maintain a minimum operating temperature of 600°F during operation or a temperature ~~and fan amperage~~ that has been determined from the most recent compliant stack tests to maintain a minimum 94% destruction of the nonmethane VOC captured.
- (d) The thermal oxidizing incinerator identified as OXD #4 shall maintain a minimum operating temperature of 1,500°F during operation or a temperature ~~and fan amperage~~ that has been determined from the most recent compliant stack test to maintain a minimum 94% destruction of the nonmethane VOC captured.
- (e) The catalytic oxidizing incinerator identified as OXD #5 shall maintain a minimum operating temperature of 600°F during operation or a temperature ~~and fan amperage~~ that has been determined from the most recent compliant stack test to maintain a minimum 94% destruction of the nonmethane VOC captured.

Note: The use of the oxidizers to control VOC emissions from Presses #1 through #4 to comply with the PSD minor VOC emission limitation was voluntarily proposed by the source. Therefore, the source may apply for a modification to remove the requirement to operate the oxidizers at all times that any of the presses are in operation under this Alternative Operating Scenario at any time if compliance with the PSD minor VOC emission limit can be achieved by other means.

Comment #7

Conditions D.1.10, D.2.10, D.3.10, D.4.10, D.5.10, D.6.10, D.7.13, D.8.13, D.9.13 and D.10.13: Revise these conditions to replace the reference to the minimum 94% destruction efficiency with a statement that indicates compliance shall be maintained with Conditions D.1.4, D.2.4, D.3.4, D.4.4, D.5.4, D.6.4, D.7.4, D.8.4, D.9.4 and D.10.4 respectively.

Response #7

Since conditions D.1.4, D.2.4, D.3.4, D.4.4, D.5.4, D.6.4, D.7.4, D.8.4, D.9.4 and D.10.4 each specify that the overall control efficiency of the capture and incineration system must be a minimum of 94%, conditions D.1.10, D.2.10, D.3.10, D.4.10, D.5.10, D.6.10, D.7.13, D.8.13, D.9.13 and D.10.13 will be revised as requested. Conditions D.1.10, D.2.10, D.3.10, D.4.10, D.5.10, D.6.10, D.8.13, D.9.13 and D.10.13 are further revised to read as follows:

D.1.10 Volatile Organic Compounds (VOC) Control

-
- (a) The catalytic and thermal oxidizers controlling VOC emissions from Presses #1 through #4 (emission units P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U8) shall be in operation at all times that these units are in operation to ensure compliance with condition D.1.4.
 - (b) The catalytic oxidizing incinerator identified as OXD#1 shall maintain a minimum operating temperature of 650°F during operation or a temperature that has been determined from the most recent compliant stack tests to maintain ~~a minimum 94% destruction of the nonmethane VOC captured.~~ **compliance with condition D.1.4.**
 - (c) The catalytic oxidizing incinerators identified as OXD#2, and OXD#3 shall each maintain a minimum operating temperature of 600°F during operation or a temperature that has been determined from the most recent compliant stack tests to maintain ~~a minimum 94% destruction of the nonmethane VOC captured.~~ **compliance with condition D.1.4.**
 - (d) The thermal oxidizing incinerator identified as OXD #4 shall maintain a minimum operating temperature of 1,500°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain ~~a minimum 94% destruction of the nonmethane VOC captured.~~ **compliance with condition D.1.4.**
 - (e) The catalytic oxidizing incinerator identified as OXD #5 shall maintain a minimum operating temperature of 600°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain ~~a minimum 94% destruction of the nonmethane VOC captured.~~ **compliance with condition D.1.4.**

Note: The use of the oxidizers to control VOC emissions from Presses #1 through #4 to comply with the PSD minor VOC emission limitation was voluntarily proposed by the source. Therefore, the source may apply for a modification to remove the requirement to operate the oxidizers at all times that any of the presses are in operation under this Alternative Operating Scenario at any time if compliance with the PSD minor VOC emission limit can be achieved by other means.

D.2.10 Volatile Organic Compounds (VOC) Control

- (a) The catalytic and thermal oxidizers controlling VOC emissions from Presses #1 through #4 (emission units P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U8) shall be in operation at all times that these units are in operation to ensure compliance with condition D.2.4.
- (b) The catalytic oxidizing incinerator identified as OXD#1 shall maintain a minimum operating temperature of 650°F during operation or a temperature that has been determined from the most recent compliant stack tests to maintain ~~a minimum 94% destruction of the nonmethane VOC captured.~~ **compliance with condition D.2.4.**
- (c) The catalytic oxidizing incinerators identified as OXD#2, and OXD#3 shall each maintain a minimum operating temperature of 600°F during operation or a temperature that has been determined from the most recent compliant stack tests to maintain ~~a minimum 94%~~

~~destruction of the nonmethane VOC captured.~~ **compliance with condition D.2.4.**

- (d) The thermal oxidizing incinerator identified as OXD#4 shall maintain a minimum operating temperature of 1,500°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain ~~a minimum 94% destruction of the nonmethane VOC captured.~~ **compliance with condition D.2.4.**
- (e) The catalytic oxidizing incinerator identified as OXD#5 shall maintain a minimum operating temperature of 600°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain ~~a minimum 94% destruction of the nonmethane VOC captured.~~ **compliance with condition D.2.4.**

Note: The use of the oxidizers to control VOC emissions from Presses #1 through #4 to comply with the PSD minor VOC emission limitation was voluntarily proposed by the source. Therefore, the source may apply for a modification to remove the requirement to operate the oxidizers at all times that any of the presses are in operation under this Alternative Operating Scenario at any time if compliance with the PSD minor VOC emission limit can be achieved by other means.

D.3.10 Volatile Organic Compounds (VOC) Control

- (a) The catalytic and thermal oxidizers controlling VOC emissions from Presses #1 through #4 (emission units P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U8) shall be in operation at all times that these units are in operation to ensure compliance with condition D.3.4.
- (b) The catalytic oxidizing incinerator identified as OXD#1 shall maintain a minimum operating temperature of 650°F during operation or a temperature that has been determined from the most recent compliant stack tests to maintain ~~a minimum 94% destruction of the nonmethane VOC captured.~~ **compliance with condition D.3.4.**
- (c) The catalytic oxidizing incinerators identified as OXD#2, and OXD#3 shall each maintain a minimum operating temperature of 600°F during operation or a temperature that has been determined from the most recent compliant stack tests to maintain ~~a minimum 94% destruction of the nonmethane VOC captured.~~ **compliance with condition D.3.4.**
- (d) The thermal oxidizing incinerator identified as OXD #4 shall maintain a minimum operating temperature of 1,500°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain ~~a minimum 94% destruction of the nonmethane VOC captured.~~ **compliance with condition D.3.4.**
- (e) The catalytic oxidizing incinerator identified as OXD #5 shall maintain a minimum operating temperature of 600°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain ~~a minimum 94% destruction of the nonmethane VOC captured.~~ **compliance with condition D.3.4.**

Note: The use of the oxidizers to control VOC emissions from Presses #1 through #4 to comply with the PSD minor VOC emission limitation was voluntarily proposed by the source. Therefore, the source may apply for a modification to remove the requirement to operate

the oxidizers at all times that any of the presses are in operation under this Alternative Operating Scenario at any time if compliance with the PSD minor VOC emission limit can be achieved by other means.

D.4.10 Volatile Organic Compounds (VOC) Control

- (a) The catalytic and thermal oxidizers controlling VOC emissions from Presses #1 through #4 (emission units P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U8) shall be in operation at all times that these units are in operation to ensure compliance with condition D.4.4.
- (b) The catalytic oxidizing incinerator identified as OXD#1 shall maintain a minimum operating temperature of 650°F during operation or a temperature that has been determined from the most recent compliant stack tests to maintain ~~a minimum 94% destruction of the nonmethane VOC captured.~~ **compliance with condition D.4.4.**
- (c) The catalytic oxidizing incinerators identified as OXD#2, and OXD#3 shall each maintain a minimum operating temperature of 600°F during operation or a temperature that has been determined from the most recent compliant stack tests to maintain ~~a minimum 94% destruction of the nonmethane VOC captured.~~ **compliance with condition D.4.4.**
- (d) The thermal oxidizing incinerator identified as OXD #4 shall maintain a minimum operating temperature of 1,500°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain ~~a minimum 94% destruction of the nonmethane VOC captured.~~ **compliance with condition D.4.4.**
- (e) The catalytic oxidizing incinerator identified as OXD #5 shall maintain a minimum operating temperature of 600°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain ~~a minimum 94% destruction of the nonmethane VOC captured.~~ **compliance with condition D.4.4.**

Note: The use of the oxidizers to control VOC emissions from Presses #1 through #4 to comply with the PSD minor VOC emission limitation was voluntarily proposed by the source. Therefore, the source may apply for a modification to remove the requirement to operate the oxidizers at all times that any of the presses are in operation under this Alternative Operating Scenario at any time if compliance with the PSD minor VOC emission limit can be achieved by other means.

D.5.10 Volatile Organic Compounds (VOC) Control

- (a) The catalytic and thermal oxidizers controlling VOC emissions from Presses #1 through #4 (emission units P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U8) shall be in operation at all times that these units are in operation to ensure compliance with condition D.5.4.
- (b) The catalytic oxidizing incinerator identified as OXD#1 shall maintain a minimum operating temperature of 650°F during operation or a temperature that has been determined from the most recent compliant stack tests to maintain ~~a minimum 94% destruction of the nonmethane VOC captured.~~ **compliance with condition D.5.4.**

- (c) The catalytic oxidizing incinerators identified as OXD#2, and OXD#3 shall each maintain a minimum operating temperature of 600°F during operation or a temperature that has been determined from the most recent compliant stack tests to maintain ~~a minimum 94% destruction of the nonmethane VOC captured.~~ **compliance with condition D.5.4.**
- (d) The thermal oxidizing incinerator identified as OXD #4 shall maintain a minimum operating temperature of 1,500°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain ~~a minimum 94% destruction of the nonmethane VOC captured.~~ **compliance with condition D.5.4.**
- (e) The catalytic oxidizing incinerator identified as OXD #5 shall maintain a minimum operating temperature of 600°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain ~~a minimum 94% destruction of the nonmethane VOC captured.~~ **compliance with condition D.5.4.**

Note: The use of the oxidizers to control VOC emissions from Presses #1 through #4 to comply with the PSD minor VOC emission limitation was voluntarily proposed by the source. Therefore, the source may apply for a modification to remove the requirement to operate the oxidizers at all times that any of the presses are in operation under this Alternative Operating Scenario at any time if compliance with the PSD minor VOC emission limit can be achieved by other means.

D.6.10 Volatile Organic Compounds (VOC) Control

- (a) The catalytic and thermal oxidizers controlling VOC emissions from Presses #1 through #4 (emission units P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U8) shall be in operation at all times that these units are in operation to ensure compliance with condition D.6.4.
- (b) The catalytic oxidizing incinerator identified as OXD#1 shall maintain a minimum operating temperature of 650°F during operation or a temperature that has been determined from the most recent compliant stack tests to maintain ~~a minimum 94% destruction of the nonmethane VOC captured.~~ **compliance with condition D.6.4.**
- (c) The catalytic oxidizing incinerators identified as OXD#2, and OXD#3 shall each maintain a minimum operating temperature of 600°F during operation or a temperature that has been determined from the most recent compliant stack tests to maintain ~~a minimum 94% destruction of the nonmethane VOC captured.~~ **compliance with condition D.6.4.**
- (d) The thermal oxidizing incinerator identified as OXD #4 shall maintain a minimum operating temperature of 1,500°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain ~~a minimum 94% destruction of the nonmethane VOC captured.~~ **compliance with condition D.6.4.**
- (e) The catalytic oxidizing incinerator identified as OXD #5 shall maintain a minimum operating temperature of 600°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain ~~a minimum 94% destruction of the nonmethane VOC captured.~~ **compliance with condition D.6.4.**

Note: The use of the oxidizers to control VOC emissions from Presses #1 through #4 to comply with the PSD minor VOC emission limitation was voluntarily proposed by the source. Therefore, the source may apply for a modification to remove the requirement to operate the oxidizers at all times that any of the presses are in operation under this Alternative Operating Scenario at any time if compliance with the PSD minor VOC emission limit can be achieved by other means.

D.7.13 Volatile Organic Compounds (VOC) Control

- (a) The catalytic and thermal oxidizers controlling VOC emissions from Presses #1 through #4 (emission units P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U8) shall be in operation at all times that these units are in operation to ensure compliance with condition D.7.4.
- (b) The catalytic oxidizing incinerator identified as OXD#1 shall maintain a minimum operating temperature of 650°F during operation or a temperature that has been determined from the most recent compliant stack tests to maintain ~~a minimum 94% destruction of the nonmethane VOC captured.~~ **compliance with condition D.7.4.**
- (c) The catalytic oxidizing incinerators identified as OXD#2, and OXD#3 shall each maintain a minimum operating temperature of 600°F during operation or a temperature that has been determined from the most recent compliant stack tests to maintain ~~a minimum 94% destruction of the nonmethane VOC captured.~~ **compliance with condition D.7.4.**
- (d) The thermal oxidizing incinerator identified as OXD #4 shall maintain a minimum operating temperature of 1,500°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain ~~a minimum 94% destruction of the nonmethane VOC captured.~~ **compliance with condition D.7.4.**
- (e) The catalytic oxidizing incinerator identified as OXD #5 shall maintain a minimum operating temperature of 600°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain ~~a minimum 94% destruction of the nonmethane VOC captured.~~ **compliance with condition D.7.4.**

Note: The use of the oxidizers to control VOC emissions from Presses #1 through #4 to comply with the PSD minor VOC emission limitation was voluntarily proposed by the source. Therefore, the source may apply for a modification to remove the requirement to operate the oxidizers at all times that any of the presses are in operation under this Alternative Operating Scenario at any time if compliance with the PSD minor VOC emission limit can be achieved by other means.

D.8.13 Volatile Organic Compounds (VOC) Control

- (a) The catalytic and thermal oxidizers controlling VOC emissions from Presses #1 through #4 (emission units P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U8) shall be in operation at all times that these units are in operation to ensure compliance with condition D.8.4.
- (b) The catalytic oxidizing incinerator identified as OXD#1 shall maintain a minimum operating temperature of 650°F during operation or a temperature that has been determined from the most recent compliant stack tests to maintain ~~a minimum 94% destruction of the~~

~~nonmethane VOC captured.~~ **compliance with condition D.8.4.**

- (c) The catalytic oxidizing incinerators identified as OXD#2, and OXD#3 shall each maintain a minimum operating temperature of 600°F during operation or a temperature that has been determined from the most recent compliant stack tests to maintain ~~a minimum 94% destruction of the nonmethane VOC captured.~~ **compliance with condition D.8.4.**
- (d) The thermal oxidizing incinerator identified as OXD #4 shall maintain a minimum operating temperature of 1,500°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain ~~a minimum 94% destruction of the nonmethane VOC captured.~~ **compliance with condition D.8.4.**
- (e) The catalytic oxidizing incinerator identified as OXD #5 shall maintain a minimum operating temperature of 600°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain ~~a minimum 94% destruction of the nonmethane VOC captured.~~ **compliance with condition D.8.4.**

Note: The use of the oxidizers to control VOC emissions from Presses #1 through #4 to comply with the PSD minor VOC emission limitation was voluntarily proposed by the source. Therefore, the source may apply for a modification to remove the requirement to operate the oxidizers at all times that any of the presses are in operation under this Alternative Operating Scenario at any time if compliance with the PSD minor VOC emission limit can be achieved by other means.

D.9.13 Volatile Organic Compounds (VOC) Control

- (a) The catalytic and thermal oxidizers controlling VOC emissions from Presses #1 through #4 (emission units P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U8) shall be in operation at all times that these units are in operation to ensure compliance with condition D.9.4.
- (b) The catalytic oxidizing incinerator identified as OXD#1 shall maintain a minimum operating temperature of 650°F during operation or a temperature that has been determined from the most recent compliant stack tests to maintain ~~a minimum 94% destruction of the nonmethane VOC captured.~~ **compliance with condition D.9.4.**
- (c) The catalytic oxidizing incinerators identified as OXD#2, and OXD#3 shall each maintain a minimum operating temperature of 600°F during operation or a temperature that has been determined from the most recent compliant stack tests to maintain ~~a minimum 94% destruction of the nonmethane VOC captured.~~ **compliance with condition D.9.4.**
- (d) The thermal oxidizing incinerator identified as OXD #4 shall maintain a minimum operating temperature of 1,500°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain ~~a minimum 94% destruction of the nonmethane VOC captured.~~ **compliance with condition D.9.4.**
- (e) The catalytic oxidizing incinerator identified as OXD #5 shall maintain a minimum operating temperature of 600°F during operation or a temperature that has been determined from the

most recent compliant stack test to maintain ~~a minimum 94% destruction of the nonmethane VOC captured.~~ **compliance with condition D.9.4.**

Note: The use of the oxidizers to control VOC emissions from Presses #1 through #4 to comply with the PSD minor VOC emission limitation was voluntarily proposed by the source. Therefore, the source may apply for a modification to remove the requirement to operate the oxidizers at all times that any of the presses are in operation under this Alternative Operating Scenario at any time if compliance with the PSD minor VOC emission limit can be achieved by other means.

D.10.13 Volatile Organic Compounds (VOC) Control

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- (a) The catalytic and thermal oxidizers controlling VOC emissions from Presses #1 through #4 (emission units P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U8) shall be in operation at all times that these units are in operation to ensure compliance with condition D.10.4.
- (b) The catalytic oxidizing incinerator identified as OXD#1 shall maintain a minimum operating temperature of 650°F during operation or a temperature that has been determined from the most recent compliant stack tests to maintain ~~a minimum 94% destruction of the nonmethane VOC captured.~~ **compliance with condition D.10.4.**
- (c) The catalytic oxidizing incinerators identified as OXD#2, and OXD#3 shall each maintain a minimum operating temperature of 600°F during operation or a temperature that has been determined from the most recent compliant stack tests to maintain ~~a minimum 94% destruction of the nonmethane VOC captured.~~ **compliance with condition D.10.4.**
- (d) The thermal oxidizing incinerator identified as OXD #4 shall maintain a minimum operating temperature of 1,500°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain ~~a minimum 94% destruction of the nonmethane VOC captured.~~ **compliance with condition D.10.4.**
- (e) The catalytic oxidizing incinerator identified as OXD #5 shall maintain a minimum operating temperature of 600°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain ~~a minimum 94% destruction of the nonmethane VOC captured.~~ **compliance with condition D.10.4.**

Note: The use of the oxidizers to control VOC emissions from Presses #1 through #4 to comply with the PSD minor VOC emission limitation was voluntarily proposed by the source. Therefore, the source may apply for a modification to remove the requirement to operate the oxidizers at all times that any of the presses are in operation under this Alternative Operating Scenario at any time if compliance with the PSD minor VOC emission limit can be achieved by other means.

Comment #8

Conditions D.7.17, D.8.17, D.9.17 and D.10.17: Does this requirement apply to the facility if a control device is used to maintain compliance with 326 IAC 8-5-5 at all times from the effective date of the permit?

Response #8

Pursuant to 326 IAC 8-1-12(c), the record keeping requirements in conditions D.7.17, D.8.17, D.9.17, and D.10.17 apply to the existing facilities on and after May 1, 1997 or upon changing the method of compliance with 326 IAC 8-5-5 from the use of compliant coatings to the use of control devices. Therefore, when the source is operating under one of the operating scenarios in sections D.7 through D.10, the record keeping requirements in conditions D.7.17, D.8.17, D.9.17, or D.10.17, respectively, would apply immediately upon commencement of operation under one of those scenarios.

Please note that although this source is required to operate the catalytic and thermal oxidizers at all times when the presses are operating to comply with the PSD minor VOC limit, sections D.1 through D.6 do not require the control devices to comply with 326 IAC 8-5-5. Therefore, the operating scenarios in sections D.1 through D.6 are for when the source would be using compliant coatings to comply with 326 IAC 8-5-5.

Comment #9

Condition D.11.3(a): Revise this condition, consistent with our letter dated June 16, 2000 to read " The total consumption of VOC to parts washer PW-1 shall be limited to 75 tons per twelve (12) consecutive month period, rolled on a monthly basis. The exhaust from PW-1 shall be vented to OXD#3, OXD#4, or a combination of OXD#3 and OXC#4 operating in parallel in order to control VOC emissions. Total VOC emissions from PW1 shall be limited to eleven and one-half (11.5) tons per twelve (12) consecutive month period, rolled on a monthly basis.

Response #9

In order for the usage limitation to PW1 to be increased to 75 tons per year, a condition must be added requiring use of the oxidizers OXD#3 and OXD#4 at all times that PW1 is operating to control VOC emissions to 11.5 tons per year. Additionally, a condition must be added requiring compliance monitoring of the oxidizers to ensure that the required control efficiency is achieved. Therefore, conditions D.11.3(a) and D.11.8 (now D.11.9) are revised as shown below and a new condition D.11.6 is added as follows:

D.11.3 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

The source wishes to limit the source-wide potential to emit VOC, to less than 250 tons per year to become a minor source under 326 IAC 2-2 (PSD) and 40 CFR 52.21. The following limits shall enable the source to achieve this status:

- (a) The total VOC consumption in parts washer PW1 shall be limited to ~~eleven and one-half (11.5)~~ **seventy five (75)** tons per twelve (12) consecutive month period, rolled on a monthly basis. The exhaust from PW1 ~~may~~ **shall** be directed to either OXD#3, ~~or OXD#4 or a combination of OXD#3 and OXD#4 operating in parallel~~ **at any all times PW1 is in operation** in order to control VOC emissions. **The capture and incineration system that is used to control VOC emissions from PW1 shall achieve a minimum overall VOC control efficiency of 84.7%. This usage limitation will then be equivalent to a VOC emission limitation of 11.5 tons per twelve (12) consecutive month period.**

- (b) The total VOC consumption in parts washer PW2 shall be limited to six (6) tons per twelve (12) consecutive month period, rolled on a monthly basis.
- (c) The total VOC consumption in degreaser SD1 shall be limited to ten (10) tons per twelve (12) consecutive month period, rolled on a monthly basis.

The above emission limits including VOC emissions from natural gas combustion, the printing operations, and the insignificant activities will limit source wide VOC emissions to less than 250 tons per year.

D.11.6 Volatile Organic Compounds (VOC) Control

- (a) **The catalytic and thermal oxidizers controlling VOC emissions from parts washer PW1 shall be in operation at all times that this unit is in operation to ensure compliance with condition D.11.3(a).**
- (b) **The catalytic oxidizing incinerator identified as OXD#3 shall maintain a minimum operating temperature of 600°F during operation or a temperature that has been determined from the most recent compliant stack tests to maintain compliance with condition D.11.3(a).**
- (c) **The thermal oxidizing incinerator identified as OXD #4 shall maintain a minimum operating temperature of 1,500°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain compliance with condition D.11.3(a).**

D.11.89 Record Keeping Requirement

- (a) To document compliance with Conditions D.11.3 and D.11.4, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.11.3 and D.11.4
 - (1) The amount and VOC and HAP content of each solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC usage **in each of parts washer PW1, parts washer PW2, and degreaser SD1** for each month; **and**
 - (5) The weight of VOC emitted for each compliance period; **and**
 - (6) **The continuous temperature records for the catalytic and thermal incinerators controlling parts washer PW1 and the temperature used to**

demonstrate compliance during the most recent compliance stack test.

- (b) These records shall be maintained in accordance with Section C - General Record Keeping Requirements.

All conditions in section D.11 have been re-numbered accordingly due to the addition of the new condition D.11.6. The quarterly report form for parts washer PW1 has been revised to include the revised VOC limit.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name: Multi-Color Corporation
Source Location: 2281 South U.S. 31, Scottsburg, Indiana 47170
County: Scott
SIC Code: 2754
Operation Permit No.: T143-9310-00007
Permit Reviewer: Trish Earls/EVP

The Office of Air Quality (OAQ) has reviewed a Part 70 permit application from Multi-Color Corporation relating to the operation of a packaging and rotogravure printing source.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (1) one (1) ten (10) station packaging rotogravure printing press identified as Press #1 (ten stations: P1U1 through P1U10), constructed in May of 1990, with a maximum line speed of 840 feet per minute (ft/min) when printing with ink and 740 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system with a total heat input rate of 7.76 million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) emissions from P1U1-P1U10 are controlled by one of the following:
 - (a) a single catalytic oxidizing incinerator identified as OXD#1 exhausting through one (1) stack (S/V ID: S-OXD1); or
 - (b) a single catalytic oxidizing incinerator identified as OXD#2 exhausting through one (1) stack (S/V ID: S-OXD2); or
 - (c) two (2) catalytic oxidizing incinerators configured in parallel, respectively identified as OXD#1 and OXD#2, with each incinerator exhausting through one (1) stack (S/V ID: S-OXD1 and S-OXD2), respectively.

- (2) one (1) nine (9) station packaging rotogravure printing press identified as Press #2 (nine stations: P2U1 through P2U9), constructed in April of 1991, with a maximum line speed of 840 feet per minute (ft/min) when printing with ink and 740 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system with a total heat input rate of 7.76 million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) emissions from P2U1-P2U9 are controlled by one of the following:
 - (a) a single catalytic oxidizing incinerator identified as OXD#2 exhausting through one (1) stack (S/V ID: S-OXD2); or
 - (b) a single catalytic oxidizing incinerator identified as OXD #5 exhausting through one (1) stack (S/V ID: S-OXD5); or
 - (c) two (2) catalytic oxidizing incinerators configured in parallel, respectively identified as OXD#2 and OXD#5, with each incinerator exhausting through one (1) stack (S/V ID: S-OXD2 and S-OXD5), respectively.

- (3) one (1) eight (8) station packaging rotogravure printing press identified as Press #3 (eight stations: P3U1 through P3U8), constructed in April of 1997, with a maximum line speed of 800 ft/min when printing with ink and 700 ft/min when printing with ink and adhesive. The volatile organic compound (VOC) emissions from P3U1-P3U8 are controlled by one catalytic oxidizing incinerator identified as OXD#5 exhausting through one (1) stack (S/V ID: S-OXD5); and
- (4) one (1) eight (8) station packaging rotogravure printing press identified as Press #4 (eight stations: P4U1 through P4U8), constructed in January of 1997, with a maximum line speed of 800 feet per minute (ft/min) when printing with ink and 700 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system with a total heat input rate of twelve (12) million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) emissions from P4U1-P4U8 are controlled by one of the following:
 - (a) a single catalytic oxidizing incinerator identified as OXD#3 exhausting through one (1) stack (S/V ID: S-OXD3); or
 - (b) a single thermal oxidizing incinerator identified as OXD#4 exhausting through one (1) stack (S/V ID: S-OXD4); or
 - (c) catalytic and thermal oxidizing incinerators configured in parallel, respectively identified as OXD#3 and OXD#4, with each incinerator exhausting through one (1) stack (S/V ID: S-OXD3 and S-OXD4), respectively.

Unpermitted Emission Units and Pollution Control Equipment

The source also consists of the following unpermitted facilities/units:

- (1) one (1) mechanical spray cold cleaner degreaser, identified as PW1, constructed in June of 1990, with a solvent consumption rate of thirty-three (33) gallons per day, utilizing closed-loop solvent recycling and distillation for VOC emissions control, and exhausting through one (1) stack (S/V ID: S-PW1); and
- (2) one (1) immersion and mechanical spray cold cleaner degreaser, identified as SD1, constructed in September of 1993, with a solvent consumption rate of fourteen (14) gallons per day, equipped with cover for VOC emissions control, and exhausting through one (1) stack (S/V ID: S-MR1).

New Emission Units and Pollution Control Equipment Receiving Prior Approval

The application includes information relating to the prior approval for the construction and operation of the following equipment pursuant to 326 IAC 2-7-5(16):

- (1) one (1) mechanical spray cold cleaner degreaser, identified as PW2, with a projected solvent consumption rate of four (4) gallons per day, utilizing closed-loop solvent recycling and distillation for VOC emissions control, and exhausting through one (1) stack (S/V ID: S-PW2).

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
 - (a) one (1) natural gas fired hot oil boiler identified as TH1 used to heat Press #3,

- rated at 6 MMBtu per hour and exhausting through one (1) stack identified as S004; and
- (b) one (1) comfort heater, rated at 4.5 MMBtu per hour.
- (2) VOC and/or HAP storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000.
 - (3) Degreasing operations that do not exceed 145 gallons per twelve (12) months, except if subject to 326 IAC 20-6.
 - (4) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
 - (5) Closed loop heating and cooling systems.
 - (6) Solvent recycling systems with batch capacity less than 100 gallons.
 - (7) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs
 - (8) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.
 - (9) Heat exchanger cleaning and repair.
 - (10) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material collection device such as a bag filter or cyclone.
 - (11) Paved and unpaved roads and parking lots with public access.
 - (12) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
 - (13) A laboratory as defined in 326 IAC 2-7-1(20)(C).
 - (14) Other categories with emissions below insignificant thresholds:
 - (a) one (1) corona treater unit which generates ozone at a rate of 0.074 pounds ozone/kilowatt/hour (supplier factor). Ozone generation rates for Press #2 treater: 16 kW = 5.18 tons per year ozone maximum.
 - (b) one (1) 10,000 gallon, three-compartment horizontal solvent storage tank, storing isopropyl acetate or lower vapor pressure products, with VOC emissions below 15 pounds per day;
 - (c) one (1) 8,000 gallon vertical solvent storage tank, storing isopropyl acetate or lower vapor pressure products, with VOC emissions below 15 pounds per day;
 - (d) Ink mixing activities including an automated ink dispensing system with VOC emissions below 15 pounds per day;
 - (e) One (1) Offset Gravure Coater station with an Electron Beam Curing Unit, with a maximum line speed of 1000 feet per minute and a printing width of 42 inches with maximum coverage of 4.74 pounds per million square inches; and
 - (f) two (2) cyclone separators for collecting paper and plastic trim generated from label trimming operations, which is then fed to a bailer which bales the material in preparation for off-site recycling or disposal. Potential PM-10 emissions from this operation are less than 25 pounds per day.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (1) A-143-9536-00007 to CP143-8004-00007, issued on April 7, 1998;
- (2) CP-143-8004-00007, issued on January 27, 1998;
- (3) CP-143-8174-00038, issued on August 6, 1997;
- (4) CP 143-1904-00038 issued on December 28, 1990;
- (5) OP# 72-02-94-0038, issued on July 2, 1990; and
- (6) PC (72) 1799, issued on November 20, 1989.

All conditions from previous approvals were incorporated into this Part 70 permit except that the VOC emission limits from the previous permits are going to be revised to limit the potential to emit VOC to less than 250 tons per year to avoid 326 IAC 2-2 (PSD) and 40 CFR 52.21. The applicant has also requested the option of applying water based materials which do not require the use of VOC control equipment to comply with 326 IAC 8-5-5 (Printing Operations). Therefore, operating conditions from previously issued construction permits which require total permanent enclosure of the thermal and catalytic oxidizing incinerators, and operation of the incinerators at all times, are going to be modified in this Part 70 Permit.

Enforcement Issue

- (a) IDEM is aware that equipment has been constructed and prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled *Unpermitted Emission Units and Pollution Control Equipment Requiring ENSR*.
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

The source has the following enforcement actions currently pending:

- (1) Agreed Order (A-3820), effective date November 30, 1998.
The Permittee shall comply with all aspects of the agreed order as specified. Certain orders of action from the agreed order are incorporated into Section D.1 of the Part 70 Operating Permit to clarify certain requirements. This does not preclude the Permittee from complying with the Agreed Order #A-3820 in its entirety. Among the violations included in the agreed order, is the source's failure to submit a timely and complete Part 70 permit application no more than twelve (12) months after U.S. EPA's approval of the Part 70 program. The required submittal date was December 13, 1996.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on December 17, 1997. Additional information was received on August 21, 1998.

On October 6, 1999, Multi-Color Corporation submitted a request to add an additional oxidizer, identified as Oxidizer #5, to their source, which would result in the reconfiguration of the exhausts from the four printing presses to the new and existing oxidizers. The addition of this oxidizer would not result in any change in emissions from the four printing presses or in the overall VOC control efficiency. The addition of the new oxidizer enables Multi-Color to increase the VOC oxidation capacity at this source and to ensure the company's compliance with Agreed Order, Cause No. A-3820. The Agreed Order requires the source to complete at least one Supplemental Environmental Project (SEP). One of these projects was to upgrade the source's existing system of incinerators in a manner which reduces air flow and emission loading concerns on the oxidizers at the facility. The installation of the additional oxidizer was found to satisfy the requirement for a SEP in the Agreed Order, Cause No. A-3820, based on a letter from the Office of Enforcement on April 4,

2000.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (two (2) pages).

Potential Emissions

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as “emissions of any one (1) pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility.”

Pollutant	Potential Emissions (tons/year)
PM	less than 100
PM-10	less than 100
SO ₂	less than 100
VOC	greater than 250
CO	less than 100
NO _x	less than 100

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential Emissions (tons/year)
Toluene	greater than 10
Styrene	less than 10
Carbon Tetrachloride	less than 10
TOTAL	greater than 25

- (a) The potential emissions (as defined in 326 IAC 1-2-55) of VOC are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential emissions (as defined in 326 IAC 1-2-55) of any single HAP is equal to or greater than ten (10) tons per year and the potential emissions (as defined in 326 IAC 1-2-55) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1997 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	0.08
PM-10	0.08
SO ₂	0.02
VOC	230.69
CO	0.55
NO _x	2.55
HAP (specify)	not reported

Limited Potential to Emit

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

	Limited Potential to Emit (tons/year)							
Process/facility	PM	PM-10	SO ₂	VOC	CO	NO _x	Single HAP	HAPs
Rotogravure Presses #1 - #4 (PIU1-10, P2U1-9, P3U1-8, P4U1-8)	--	--	--	207.48	--	--	78.00	78.54
Parts Washer PW1				11.50				
Parts Washer PW2				6.00				
Solvent Degreaser SD1	--	--	--	10.00	--	--	--	--
Natural Gas Combustion	2.26	2.26	0.18	1.63	24.95	29.71	--	--
Insignificant Activities	--	--	--	11.42	--	--	--	--
Total Emissions	2.26	2.26	0.18	248.03	24.95	29.71	78.00	78.54

County Attainment Status

The source is located in Scott County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Scott County has been designated as attainment or unclassifiable for ozone.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.

- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

40 CFR Part 60, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units)

The natural gas fired 6 MMBtu per hour hot oil boiler at Press #3 (see Insignificant Activities) is not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.40c through 60.48c, Subpart Dc) because although it was constructed after June 9, 1989, it has a heat input capacity less than 10 MMBtu per hour.

40 CFR 60, Subpart Kb (Standards of Performance for Volatile Organic Liquid Storage Vessels)

The one (1) 10,000 gallon isopropyl acetate storage tank, and one (1) 8,000 gallon isopropyl acetate storage tank, (see Insignificant Activities) are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.110b, Subpart Kb) because the tanks each have a storage capacity less than 40 cubic meters.

40 CFR Part 60, Subpart QQ (Standards of Performance for the Graphic Arts Industry: Publication Rotogravure Printing)

This facility is not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.430 through 60.435, Subpart QQ) because it is a packaging rotogravure printing press, not a publication rotogravure printing press to which Subpart QQ applies.

40 CFR Part 63, Subpart T (National Emissions Standards for Halogenated Solvent Cleaning)

The cold cleaner degreasing facilities PW1, PW2, and SD1 are not subject to the National Emissions Standards for Hazardous Air Pollutants, 326 IAC 20, (40 CFR Part 63.460 through 63.480, Subpart T) because they do not utilize any of the halogenated solvents (methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride, or chloroform), or any combination of these halogenated HAP solvents in a total concentration greater than 5 percent by weight.

40 CFR Part 63, Subpart KK (National Emissions Standards for Printing and Publishing Industry)

This packaging rotogravure printing source, inclusive of Press #1 through #4 (emission units P1U1-10, P2U1-9, P3U1-8, and P4U1-8), is subject to the NESHAP (National Emission Standards for Hazardous Air Pollutants), 40 CFR 63, and 326 IAC 20-18 because the potential emissions of any combination of HAPs and a single HAP are each greater than 25 and 10 tons per year, respectively. This rule requires major sources of hazardous air pollutants (HAPs), as defined in 40 CFR 63.2, to comply with the following:

- (a) Limit the organic Hazardous Air Pollutant (HAP) emissions to:
 - (1) no more than 5 percent of the organic HAP applied for the month; or
 - (2) no more than 4 percent of the mass of inks, coatings, varnishes, adhesives, primers, solvents, reducers, thinners, and other materials applied for the month; or
 - (3) no more than 20 percent of the mass of solids applied for the month; or
 - (4) a calculated equivalent allowable mass based on the organic HAP and solids contents of the inks, coatings, varnishes, adhesives, primers, solvents, reducers, thinners, and other materials applied for the month.

- (b) Demonstrate compliance with the organic HAP limit by following one of the procedures listed in 40 CFR 63.825(b)(1) through 40 CFR 63.825(b)(10). Each procedure shall be considered a separate Alternate Operating Scenario for this source and is described in Sections D.1 through D.10 of the Part 70 Permit.
- (c) Pursuant to 40 CFR 63, Subpart KK, the packaging rotogravure printing source shall:
 - (1) Conduct initial performance testing using the test methods specified in 40 CFR 63.827.
 - (2) Monitor and inspect the control devices according to the applicable requirements of 40 CFR 63.828.
 - (3) Comply with the applicable record keeping requirements specified in 40 CFR 63.829.
 - (4) Submit the following reports as required in 40 CFR 63.830:
 - (A) An initial notification as required in 40 CFR 63.9(b);
 - (B) A Notification of Performance Tests as specified in 40 CFR 63.7 and 40 CFR 63.9(e);
 - (C) A Notification of Compliance Status as specified in 40 CFR 63.9(h);
 - (D) Performance test reports as specified in 40 CFR 63.10(d)(2);
 - (E) Start-up, shutdown, and malfunction reports as specified in 40 CFR 63.10(d)(5), except that the provisions in 40 CFR 63 Subpart A pertaining to start-ups, shutdowns, and malfunctions do not apply unless a control device is used to comply with 40 CFR 63 Subpart KK; and
 - (F) A summary report as specified in 40 CFR 63.10(e)(3) shall be submitted on a semi-annual basis.

For the purposes of Subpart KK, the administratively complete Part 70 permit application received by the OAQ on December 17, 1997, will satisfy the initial notification requirements under 40 CFR 63.9(b).

State Rule Applicability - Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)

The source has submitted a Preventive Maintenance Plan (PMP) on August 21, 1998 for the oxidizers OXD#1-OXD#4. This PMP has been verified to fulfill the requirements of 326 IAC 1-6-3 (Preventive Maintenance Plan).

326 IAC 2-2 (Prevention of Significant Deterioration)

This source is currently considered a major source under 326 IAC 2-2 (PSD) and 40 CFR 52.21 for volatile organic compound (VOC) emissions. However, through this Part 70 Operating permit, the source wishes to limit the source-wide potential to emit VOC, to less than 250 tons per year to become a minor source under 326 IAC 2-2 (PSD) and 40 CFR 52.21. The source has proposed the following limits to achieve this status:

- (1) The printing operations shall be limited as follows:
 - (a) The total input VOC, including coatings, dilution solvents, and cleaning solvents, to Presses #1 - #4 (emission units P1U1-10, P2U1-9, P3U1-8, and P4U1-8) shall be limited to 3,458 tons per twelve (12) consecutive month period, rolled on a monthly basis. VOC emissions from each press shall be controlled by a capture and incineration system that achieves a minimum overall control efficiency of 94%. This will limit the potential to emit VOC from Presses #1 - #4 (P1U1-10, P2U1-9, P3U1-8, and P4U1-8) to 207.5 tons per twelve (12) consecutive month period.
- (2) The cold cleaner degreasing operations at the source shall be limited as follows:
 - (a) The total VOC consumption in parts washer PW1 shall be limited to eleven and one-half (11.5) tons per twelve (12) consecutive month period, rolled on a monthly basis. The exhaust from PW1 may be directed to either OXD#3 or OXD#4 at any time in order to control VOC emissions.
 - (b) The total VOC consumption in parts washer PW2 shall be limited to six (6) tons per twelve (12) consecutive month period, rolled on a monthly basis.
 - (c) The total VOC consumption in degreaser SD1 shall be limited to ten (10) tons per twelve (12) consecutive month period, rolled on a monthly basis.

These VOC usage limits, when combined with VOC emissions from insignificant activities at the source (1.63 tons VOC/yr from natural gas combustion and 11.42 tons per year from other insignificant activities) shall limit the potential to emit VOC from the source to less than 250 tons per year. Therefore, 326 IAC 2-2 (PSD) and 40 CFR 52.21 are not applicable and this source qualifies as a minor source under those rules.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 2-4.1-1 (New Source Toxics Control)

Pursuant to 326 IAC 2-4.1-1 (New Source Toxics Control), any new process or production unit which in and of itself emits or has the potential to emit (PTE) 10 tons per year of any HAP or 25 tons per year of the combination of HAPs, and is constructed or reconstructed after July 27, 1997, must be controlled using technologies consistent with Maximum Achievable Control Technology (MACT). Press # 3 (P3U1 - P3U8), Press # 4 (P4U1 - P4U8), and the cold cleaner degreasers (PW1, and SD1) were all constructed prior to July 27, 1997, therefore, they are not subject to this rule. The new degreaser PW2 is not subject to this rule because the potential to emit HAPs from this facility is negligible. Press # 1 (P1I1 - P1U10) and Press # 2 (P2U1 - P2U9) are subject to the requirements of 326 IAC 2-4.1-1. Compliance with the requirements of 40 CFR Part 63, Subpart KK will satisfy the requirements of this rule.

326 IAC 6-2 (Particulate Emissions Limitations for Sources of Indirect Heating)

The 6.0 million Btu per hour (MMBtu/hr) natural gas fired hot oil boiler TH1 is subject 326 IAC 6-2 (Particulate Emissions Limitations for Sources of Indirect Heating). Pursuant to 326 IAC 6-2-4, particulate matter (PM) emissions from indirect heating facilities constructed after September 21, 1983 shall be limited by the following equation:

$$Pt = 1.09 / Q^{0.26} \text{ where: } Pt = \text{pounds of PM emitted per MMBtu heat input (lb/MMBtu)} \\ Q = \text{total source operating capacity (MMBtu/hr)}$$

$$Pt = 1.09 / 6.0^{0.26} = 0.68 \text{ lb/MMBtu} \quad \text{however, pursuant to 326 IAC 6-2-4, for } Q \text{ less than } 10 \text{ MMBtu/hr, } Pt \text{ shall not exceed } 0.6 \text{ lb/MMBtu.}$$

The 6.0 MMBtu/hr natural gas fired hot oil boiler TH1 shall comply with the allowable PM emission limit of 0.6 lb/MMBtu as follows:

$$\text{Allowable PM emissions (tons per year)} = (0.6 \text{ lb/MMBtu}) * (6.0 \text{ MMBtu/hr}) * (8760 \text{ hr/yr}) * (1 \text{ ton}/2000 \text{ lbs}) = 15.8 \text{ tons/year}$$

The potential PM emissions for the boiler of 0.31 tons per year, (see Appendix A , page 2 of 2, for detailed calculations) are less than the 15.8 tons per year allowable emission rate, therefore, this boiler complies with the rule.

326 IAC 8-1-6 (General Reduction Requirements)

Pursuant to 326 IAC 8-1-6 (General Reduction Requirements), facilities not regulated by other rules in Article 8, with potential VOC emissions equal to or greater than 25 tons per year, shall comply utilize Best Available Control Technology.

- (a) The four (4) packaging rotogravure printing presses are subject to 326 IAC 8-5-5 (Graphic Arts Operations), therefore, they are not subject to this rule.
- (b) The four (4) degreasing operations are subject to 326 IAC 8-3-2 or 326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control), therefore, they are not subject to this rule.

326 IAC 8-1-10 (VOC Compliance Certification, Record Keeping and Reporting Requirements for Certain Coating Facilities Using Compliant Coatings)

- (a) Pursuant to 326 IAC 8-1-10(a), this rule applies to any source that uses compliant coatings to comply with a VOC emission limit, and which also meets the applicability of criteria of 326 IAC 8-5-5(a)(1), (a)(2), or (a)(3) for Graphics Arts Operations. This source meets the applicability criteria of 326 IAC 8-5-5(a)(2). The source also proposes to use water based compliant coatings in some of its operations to meet the requirements of 326 IAC 8-5-5,

therefore, the requirements of 326 IAC 8-1-10 apply to this source when using the water based coatings.

- (b) Pursuant to 326 IAC 8-1-10(b), the owner or operator of the coating source shall certify to the department that the coating facility is in compliance with the requirements of 326 IAC 8-5-5 (Graphic Arts Operations). The certification shall include the following:
 - (1) The name and location of the source
 - (2) The name, address, and telephone number of the person responsible for the source.
 - (3) Identification of each VOC emitting coating facility and identification of the applicable emission limitation.
 - (4) The name and identification number of each coating, as applied, used at each coating facility.
 - (5) The mass of VOC (excluding water and exempt compounds) per volume of coating and the volume of each coating, as applied.
- (c) Pursuant to 326 IAC 8-1-10(c), upon changing the method of compliance for an existing coating facility from control devices to the use of compliant coatings, the owner or operator of the coating facility shall for each coating facility and for each coating used collect and record each day and maintain all of the following information:
 - (1) The name and identification number of each coating, as applied.
 - (2) The mass of VOC (excluding water and exempt compounds) per volume of coating for each coating, as applied, or the VOC content of each coating, as applied, expressed in units necessary to determine compliance.
 - (3) As new compliant coatings are added to a coating facility, the records required by this subsection shall be updated to include the new coating.
 - (4) If use of a coating is discontinued, the records required by this section shall be maintained consistent with 326 IAC 8-1-9(c).
- (d) Pursuant to 326 IAC 8-1-10(d), by May 1, 1997, the owner or operator of a coating facility shall notify the department in either of the following instances:
 - (1) Any record showing use of any noncompliant coatings shall be reported by submitting a copy of the record to the department within thirty (30) days following use; such record shall also be submitted with the quarterly compliance report.
 - (A) Name and location of the coating facility.
 - (B) Time, date, and duration of the noncompliance.
 - (C) Corrective action taken.
 - (2) At least thirty (30) calendar days before changing the method of compliance from the use of compliant coatings to daily-weighted averaging or control devices, the owner or operator shall comply with all requirements of section 11(b) or 12(b) of this rule, respectively. Upon changing the method of compliance for a coating facility from the use of compliant coatings to daily-weighted averaging or control devices, the owner or operator shall comply with all requirements of 326 IAC 8-1-11 or 326 IAC 8-1-12, respectively.

326 IAC 8-1-12 (VOC Compliance Certification, Record Keeping and Reporting Requirements for Certain Coating Facilities Using Control Devices)

- (a) Pursuant to 326 IAC 8-1-12(a), this rule applies to any source that uses a control device to comply with a VOC emission limit, and which also meets the applicability of criteria of 326 IAC 8-5-5(a)(1), (a)(2), or (a)(3) for Graphics Arts Operations. This source meets the applicability criteria of 326 IAC 8-5-5(a)(2). The source also proposes to use control devices to meet the requirements of 326 IAC 8-5-5 when applying solvent based materials, therefore, the requirements of 326 IAC 8-1-12 apply to this source when operating the VOC control devices.

- (b) Pursuant to 326 IAC 8-1-12(b), by May 1, 1997, the owner or operator of the coating facility shall comply with the following requirements:
 - (1) Control system operation, maintenance, and testing requirements shall be as follows:
 - (A) The control system shall be operated and maintained according to the manufacturer's recommendations but may be modified based on the results of the initial or subsequent compliance test or upon the written request of the department.
 - (B) A copy of the operating and maintenance procedures shall be maintained in a convenient location at the source property and as close to the control system as possible for reference by plant personnel and department inspectors.
 - (C) The control system shall be tested according to the following schedule and in the following situations:
 - (i) An initial compliance test shall be conducted. Compliance tests shall be conducted no later than every thirty (30) months after the date of the initial test.
 - (ii) A compliance test shall be conducted whenever the owner or operator chooses to operate a control system under conditions different from those that were in place at the time of the previous test.
 - (iii) A compliance test shall be performed within ninety (90) days of:
 - (a) startup of a new coating facility
 - (b) changing the method of compliance
 - (c) receipt of a written request from the department or U.S.EPA.
 - (D) All compliance tests shall be conducted according to a protocol approved by the department at least thirty (30) days before the test.
 - (2) Monitoring equipment requirements shall be as follows:
 - (A) If a thermal incinerator is used for VOC reduction, a temperature monitoring device capable of continuously recording the temperature of the gas stream in the combustion zone of the incinerator shall be used. The device shall have an accuracy of ± 1 (one) percent of the temperature being monitored in degrees Celsius, or ± 0.5 (five-tenths) degree Celsius, whichever is more accurate.
 - (B) If a catalytic incinerator is used for VOC reduction, a temperature monitoring device capable of continuously recording the temperature of in the gas stream immediately before and after the catalyst bed of the incinerator shall be used. The device shall have an accuracy of ± 1 (one) percent of the temperature being monitored in degrees Celsius, or ± 0.5 (five-tenths) degree Celsius, whichever is more accurate.
 - (C) Where a VOC recovery device other than a carbon adsorber is used, the source shall provide to the department information describing the operation of the device and the process parameters that would indicate proper operation and maintenance of the control device. The department may request further information and will specify appropriate monitoring procedures, record keeping, and reporting requirements.
- (c) Pursuant to 326 IAC 8-1-12(c), on and after May 1, 1997, the owner or operator of a coating facility identified in 326 IAC 8-1-12(a) shall collect and record each day and maintain all of the following information each day for each coating facility:
 - (1) The name and identification number of each coating used at each coating facility.
 - (2) The mass of VOC per unit of volume of coating solids, as applied, the volume

- solids content, as applied, and the volume, as applied, of each coating expressed in units necessary to determine compliance, used each day at each coating facility.
- (3) The maximum VOC content (mass of VOC per unit of volume of coating solids, as applied) or the daily-weighted average VOC content (mass of VOC per unit of volume of coating solids, as applied) of the coatings used each day on each coating facility.
 - (4) The required overall emission reduction efficiency for each day for each coating facility.
 - (5) The actual overall emission reduction efficiency achieved for each day for each coating facility as determined during the compliance test required by subsection (b)(1)(C) of this rule.
 - (6) Control device monitoring data as follows:
 - (A) For thermal incinerators, the following:
 - (i) Continuous records of the temperature in the gas stream in the combustion zone of the incinerator.
 - (ii) Records of all three (3) hour periods of operation in which the average combustion temperature of the gas stream in the combustion zone was more than fifty degrees Fahrenheit (50° F) (twenty-eight degrees Centigrade (28° C) below the average combustion temperature that existed during the most recent test that demonstrated that the coating facility was in compliance.
 - (B) For catalytic incinerators, the following:
 - (i) Continuous records of the temperature of the gas stream both upstream and downstream of the catalyst bed of the incinerator.
 - (ii) Records of all three (3) hour periods of operation in which the average temperature measured at the process vent stream immediately before the catalyst bed is more than fifty degrees Fahrenheit (50° F) (twenty-eight degrees Centigrade (28° C) below the average combustion temperature that existed during the most recent test that demonstrated that the coating facility was in compliance.
 - (iii) Records of all three (3) hour periods of operation in which the average temperature difference across the catalyst bed is less than eighty percent (80%) of the temperature difference measured during the most recent test that demonstrated that the coating facility was in compliance.
 - (7) A log of operating time for the capture system, control device, monitoring equipment, and the associated coating facility.
 - (8) A maintenance log for the capture system, control device, and monitoring equipment detailing all routine and non-routine maintenance performed including the dates and duration of any outages.
- (d) Pursuant to 326 IAC 8-1-12(d), on and after May 1, 1997, the owner or operator of a coating facility shall notify the department in either of the following instances:
- (1) Any record showing noncompliance with the applicable requirements for control devices shall be reported by submitting a copy of the record to the department within thirty (30) days following noncompliance; such record shall also be submitted with the quarterly compliance report. The following information shall accompany each submittal:
 - (A) Name and location of the coating facility.
 - (B) Identification of the control system where the noncompliance occurred and the coating facility it served.

- (C) Time, date, and duration of the noncompliance.
- (D) Corrective action taken.
- (2) At least thirty (30) calendar days before changing the method of compliance from the use of control device to the use of compliant coatings or daily-weighted averaging, the owner or operator shall comply with all requirements of section 326 IAC 8-1-10(b) or 326 IAC 8-1-11(b), respectively. Upon changing the method of compliance for a coating facility from control devices to the use of compliant coatings or daily-weighted averaging, the owner or operator shall comply with all requirements of 326 IAC 8-1-10 or 326 IAC 8-1-11, respectively.

326 IAC 8-3-2 (Cold Cleaner Operations)

The automated parts washer PW1 is subject to this rule because it is a cold cleaner degreaser and was constructed prior to July 1, 1990 in Scott County. The parts washer PW2, as well as the solvent cold cleaning tank SD1 are not subject to this rule because they were constructed after July 1, 1990 and are therefore subject to 326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control). Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator of PW1 shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)

The cold cleaner degreasing operations PW2, and SD1 are subject to this rule because they were constructed after July 1, 1990 in Scott County. These degreasing operations shall comply with the following requirements.

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:
 - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

- (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:
 - (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

326 IAC 8-5-5 (Graphic Arts Operations)

The packaging rotogravure printing Presses #1 through #4 are subject to 326 IAC 8-5-5 because they were constructed after 1980 and have potential VOC emissions greater than 25 tons per year. Pursuant to this rule, no owner or operator of a facility subject to this section and employing solvent-containing ink may cause, allow, or permit the operation of the facility unless:

- (a) the volatile fraction of the ink, as it is applied to the substrate, contains twenty-five (25) percent by volume or less of VOC, and seventy-five (75) percent by volume or more of water; or
- (b) the ink as it is applied to the substrate, less water, contains sixty (60) percent by volume or more of nonvolatile material; or
- (c) the owner or operator installs and operates a control device (i.e. incineration system) that oxidizes at least 90% of the nonmethane VOC to carbon dioxide and water and utilizes a capture system that, when used in conjunction with the control device, shall attain an efficiency sufficient to achieve an overall VOC control efficiency of sixty-five (65%) percent; and
- (d) the ink, as applied to the substrate, meets an emission limit of 0.5 pounds of VOC per pound of solids in the ink.

The source shall comply with the VOC content limitations specified above by either using water based materials (Scenarios #1-6) or utilizing a VOC capture and control system with an overall VOC control efficiency of 94% at Presses #1 - #4 when utilizing solvent based materials (Scenarios #7-10). Therefore, the source is in compliance with this rule.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. The four (4) packaging rotogravure printing presses have applicable compliance monitoring conditions as specified below:
 - (a) Pursuant to 326 IAC 8-1-10(b), the owner or operator of the coating source using compliant coatings shall certify to the department that the coating facility is in compliance with the requirements of 326 IAC 8-5-5 (Graphic Arts Operations). The certification shall include the following:
 - (1) The name and location of the source
 - (2) The name, address, and telephone number of the person responsible for the source.
 - (3) Identification of each VOC emitting coating facility and identification of the applicable emission limitation.
 - (4) The name and identification number of each coating, as applied, used at each coating facility.
 - (5) The mass of VOC (excluding water and exempt compounds) per volume of coating and the volume of each coating, as applied.
 - (b) Pursuant to 326 IAC 8-1-10(c), upon changing the method of compliance for an existing coating facility from control devices to the use of compliant coatings, the owner or operator of the coating facility shall for each coating facility and for each coating used collect and record each day and maintain all of the following information:
 - (1) The name and identification number of each coating, as applied.
 - (2) The mass of VOC (excluding water and exempt compounds) per volume of coating for each coating, as applied, or the VOC content of each coating, as applied, expressed in units necessary to determine compliance.
 - (3) As new compliant coatings are added to a coating facility, the records required by this subsection shall be updated to include the new coating.
 - (4) If use of a coating is discontinued, the records required by this section shall be maintained consistent with 326 IAC 8-1-9(c).

- (c) Pursuant to 326 IAC 8-1-12(b), by May 1, 1997, the owner or operator of the coating facility using a control device to comply with a VOC emission limit, shall comply with the following requirements:
 - (1) Control system operation, maintenance, and testing requirements shall be as follows:
 - (A) The control system shall be operated and maintained according to the manufacturer's recommendations but may be modified based on the results of the initial or subsequent compliance test or upon the written request of the department.
 - (B) A copy of the operating and maintenance procedures shall be maintained in a convenient location at the source property and as close to the control system as possible for reference by plant personnel and department inspectors.
 - (C) The control system shall be tested according to the following schedule and in the following situations:
 - (i) An initial compliance test shall be conducted.
Compliance tests shall be conducted no later than every thirty (30) months after the date of the initial test.
 - (ii) A compliance test shall be conducted whenever the owner or operator chooses to operate a control system under conditions different from those that were in place at the time of the previous test.
 - (iii) A compliance test shall be performed within ninety (90) days of:
 - (a) startup of a new coating facility
 - (b) changing the method of compliance
 - (c) receipt of a written request from the department or U.S.EPA.
 - (D) All compliance tests shall be conducted according to a protocol approved by the department at least thirty (30) days before the test.
 - (2) Monitoring equipment requirements shall be as follows:
 - (A) If a thermal incinerator is used for VOC reduction, a temperature monitoring device capable of continuously recording the temperature of the gas stream in the combustion zone of the incinerator shall be used. The device shall have an accuracy of ± 1 (one) percent of the temperature being monitored in degrees Celsius, or ± 0.5 (five-tenths) degree Celsius, whichever is more accurate.
 - (B) If a catalytic incinerator is used for VOC reduction, a temperature monitoring device capable of continuously recording the temperature of in the gas stream immediately before and after the catalyst bed of the incinerator shall be used. The device shall have an accuracy of ± 1 (one) percent of the temperature being monitored in degrees Celsius, or ± 0.5 (five-tenths) degree Celsius, whichever is more accurate.

- (C) Where a VOC recovery device other than a carbon adsorber is used, the source shall provide to the department information describing the operation of the device and the process parameters that would indicate proper operation and maintenance of the control device. The department may request further information and will specify appropriate monitoring procedures, record keeping, and reporting requirements.
- (d) Pursuant to 326 IAC 8-1-12(c), on and after May 1, 1997, the owner or operator of a coating facility identified in 326 IAC 8-1-12(a) shall collect and record each day and maintain all of the following information each day for each coating facility:
 - (1) The name and identification number of each coating used at each coating facility.
 - (2) The mass of VOC per unit of volume of coating solids, as applied, the volume solids content, as applied, and the volume, as applied, of each coating expressed in units necessary to determine compliance, used each day at each coating facility.
 - (3) The maximum VOC content (mass of VOC per unit of volume of coating solids, as applied) or the daily-weighted average VOC content (mass of VOC per unit of volume of coating solids, as applied) of the coatings used each day on each coating facility.
 - (4) The required overall emission reduction efficiency for each day for each coating facility.
 - (5) The actual overall emission reduction efficiency achieved for each day for each coating facility as determined during the compliance test required by subsection (b)(1)(C) of this rule.
 - (6) Control device monitoring data as follows:
 - (A) For thermal incinerators, the following:
 - (i) Continuous records of the temperature in the gas stream in the combustion zone of the incinerator.
 - (ii) Records of all three (3) hour periods of operation in which the average combustion temperature of the gas stream in the combustion zone was more than fifty degrees Fahrenheit (50° F) (twenty-eight degrees Centigrade (28° C) below the average combustion temperature that existed during the most recent test that demonstrated that the coating facility was in compliance.
 - (B) For catalytic incinerators, the following:
 - (i) Continuous records of the temperature of the gas stream both upstream and downstream of the catalyst bed of the incinerator.
 - (ii) Records of all three (3) hour periods of operation in which the average temperature measured at the process vent stream immediately before the catalyst bed is more than fifty degrees Fahrenheit (50° F) (twenty-eight degrees Centigrade (28° C) below the average combustion temperature that existed during the most recent test that demonstrated that the coating facility was in compliance.

- (iii) Records of all three (3) hour periods of operation in which the average temperature difference across the catalyst bed is less than eighty percent (80%) of the temperature difference measured during the most recent test that demonstrated that the coating facility was in compliance.
- (7) A log of operating time for the capture system, control device, monitoring equipment, and the associated coating facility.
- (8) A maintenance log for the capture system, control device, and monitoring equipment detailing all routine and non-routine maintenance performed including the dates and duration of any outages.
- (e) The total input VOC, including coatings, dilution solvents, and cleaning solvents, to Presses #1 - #4 (emission units P1U1-10, P2U1-9, P3U1-8, and P4U1-8) shall be limited to 3,458 tons per twelve (12) consecutive month period, rolled on a monthly basis. VOC emissions from each press shall be controlled by a capture and incineration system that achieves a minimum overall control efficiency of 94%. This will limit the potential to emit VOC from Presses #1 - #4 (P1U1-10, P2U1-9, P3U1-8, and P4U1-8) to 207.5 tons per twelve (12) consecutive month period.

The Permittee shall record monthly the amount of VOC used at each press and shall submit quarterly reports to OAQ Compliance Section.

- 2. The cold cleaner degreasing operations have the following applicable compliance monitoring requirements:
 - (a) The total VOC consumption in parts washer PW1 shall be limited to eleven and one-half (11.5) tons per twelve (12) consecutive month period, rolled on a monthly basis.
 - (b) The total VOC consumption in parts washer PW2 shall be limited to six (6) tons per twelve (12) consecutive month period, rolled on a monthly basis.
 - (c) The total VOC consumption in degreaser SD1 shall be limited to ten (10) tons per twelve (12) consecutive month period, rolled on a monthly basis.

The Permittee shall record monthly the amount of VOC used at each degreasing facility and shall submit quarterly reports to OAQ Compliance Section.

Conclusion

The operation of this packaging rotogravure printing plant shall be subject to the conditions of the attached proposed **Part 70 Permit No. T143-9310-00007**.

Appendix A: Emission Calculations

Company Name: Multi-Color Corporation
Address City IN Zip: 2281 South U.S. 31, Scottsburg, Indiana 47170
Title V: T143-9310-00007
Reviewer: JM/EVP
Date: November 12, 1998

Uncontrolled Potential Emissions (tons/year)					
Emissions Generating Activity					
Pollutant	Natural Gas Combustion	Presses #1 - #4	Solvent Degreasing SD1, PW1, PW2	Insignificant Activities	TOTAL
PM	2.26	0.00	0.00	0.00	2.3
PM10	2.26	0.00	0.00	0.00	2.3
SO2	0.18	0.00	0.00	0.00	0.2
NOx	29.71	0.00	0.00	0.00	29.7
VOC	1.63	3,458.00	139.22	11.42	3,610.3
CO	24.95	0.00	0.00	0.00	25.0
total HAPs	0.00	1,309.00	0.00	0.00	1,309.0
worst case single HAP	0.00	Toluene: 1,300.00	0.00	0.00	1,300.0
Total emissions based on rated capacity at 8,760 hours/year					
Controlled Potential Emissions (tons/year)					
Emissions Generating Activity					
Pollutant	Natural Gas Combustion	Presses #1 - #4 (Solvent based application)	Solvent Degreasing SD1, PW1, PW2	Insignificant Activities	TOTAL
PM	2.26	0.00	0.00	0.00	2.3
PM10	2.26	0.00	0.00	0.00	2.3
SO2	0.18	0.00	0.00	0.00	0.2
NOx	29.71	0.00	0.00	0.00	29.7
VOC	1.63	207.48	27.50	11.42	248.0
CO	24.95	0.00	0.00	0.00	25.0
total HAPs	0.00	78.54	0.00	0.00	78.5
worst case single HAP	0.00	78.00	0.00	0.00	78.0

Total emissions based on rated capacity at 8,760 hours/year, after controls and/or input limitations.

- (a) Uncontrolled potential VOC emissions for solvent based application at Press #1,#2,#3,#4 based on information from the source.

The Permittee stated that the total input VOC shall not exceed 3,458 tons per year.

Controlled potential VOC emissions for solvent based application at Press #1,#2,#3,#4 based on 94% control efficiency of the oxidizers.

- (b) Uncontrolled potential Toluene emissions for solvent based application at Press #1,#2,#3,#4 based on the Permittee's original Part 70 application received by IDEM on December 17, 1997.

Controlled potential Toluene emissions for solvent based application at Press #1,#2,#3,#4 based on 94% control efficiency of the oxidizers.

- (c) Uncontrolled potential VOC emissions for the solvent degreasing operation based on information submitted by applicant in revised Part 70 application submitted August 20, 1998.

Controlled potential VOC emission for the solvent degreasing operations based on input VOC limits exhausted uncontrolled to the atmosphere, except for PW-1 which is controlled by oxidizers OXD3 and/or OXD4.

- (d) Potential VOC emissions from insignificant activities include 2.14 tons per year from the one (1) 10,000 gallon horizontal solvent storage tank and the one (1) 8,000 gallon vertical solvent storage tank and a de minimus value of 3.0 tons per year from the other VOC emitting insignificant activities identified as items 2, 3, 6, 7, and 8 in the Insignificant Activities section of the TSD.

Emissions also include 6.28 tons per year from the newly installed electron beam (EB) coating and curing line as permitted in Exemption No. 143-11915-00007, issued July 19, 2000.

Appendix A: Emission Calculations
VOC From Printing Press Operations

Page 2 of 3 TSD App A

Company Name: Multi-Color Corporation
Address City IN Zip: 2281 South U.S. 31, Scottsburg, Indiana 47170
Title V: T143-9310-00007
Reviewer: JM/EVP
Date: November 12, 1998

Potential Uncontrolled Emissions:

Throughput for Packaging Rotogravure Printing Press:															
Press I.D.	Maximum Line Speed (ft/min)	Convert Feet to Inches	Maximum Print Width (in)	60 Min/ Hour	8,760 HR YEAR	1/1,000,000	Potential MMin²/Year								
Press #1	840	12	39.4	60	8,760	1,000,000	208,743								
Press #2	840	12	39.4	60	8,760	1,000,000	208,743								
Press #3	700	12	39.3	60	8,760	1,000,000	173,511								
Press #4	800	12	44.0	60	8,760	1,000,000	222,013								
PRINTING VOC:															
Ink Name	Maxium Coverage lbs/ MMin²	Weight % Organics	Flash Off %	Potential Throughput MMin²/Year	Tons/ 2,000 lbs	Potential VOC Pounds per Hour	Potential VOC Tons per Year	Control Equipment ID	Capture Efficiency	Destruction Efficiency	Controlled VOC Pounds per Hour	Controlled VOC Tons per Year	VOC Input Limit as % of potential input	Limited/Controlled VOC Tons per Year	Total Limited VOC input Tons per Year
Press #1 - Adcote Adhesive	10.9	77.19%	100%	208,743	2,000	200.49	878.15	OXD#1	100.00%	95.00%	10.02	43.91	53.00%	23.27	465.42
Press #1 - Minute Maid Yellow Ink	8.5	75.32%	100%	208,743	2,000	152.56	668.21	OXD#1	100.00%	95.00%	7.63	33.41	53.00%	17.71	354.15
Press #1 - TF IML 2D Topcoat Varnish	8.5	67.34%	100%	208,743	2,000	136.40	597.41	OXD#1	100.00%	95.00%	6.82	29.87	53.00%	15.83	316.63
Press #2 - Adcote Adhesive	10.9	77.19%	100%	208,743	2,000	200.49	878.15	OXD#2	100.00%	95.00%	10.02	43.91	53.00%	23.27	465.42
Press #2 - Minute Maid Yellow Ink	8.5	75.32%	100%	208,743	2,000	152.56	668.21	OXD#2	100.00%	95.00%	7.63	33.41	53.00%	17.71	354.15
Press #2 - TF IML 2D Topcoat Varnish	8.5	67.34%	100%	208,743	2,000	136.40	597.41	OXD#2	100.00%	95.00%	6.82	29.87	53.00%	15.83	316.63
Press #3 - Adcote Adhesive	10.80	77.19%	100%	173,511	2,000	165.12	723.24	OXD#2, #3, #4	100.00%	95.00%	8.26	36.16	53.00%	19.17	383.32
Press #3 - Minute Maid Yellow Ink	8.5	75.32%	100%	173,511	2,000	126.81	555.43	OXD#2, #3, #4	100.00%	95.00%	6.34	27.77	53.00%	14.72	294.38
Press #3 - TF IML 2D Topcoat Varnish	8.5	67.34%	100%	173,511	2,000	113.37	496.58	OXD#2, #3, #4	100.00%	95.00%	5.67	24.83	53.00%	13.16	263.19
Press #4 - Adcote Adhesive	9.6	77.19%	100%	222,013	2,000	187.81	822.59	OXD#2, #3, #4	100.00%	95.00%	9.39	41.13	53.00%	21.80	435.97
Press #4 - Minute Maid Yellow Ink	7.6	75.32%	100%	222,013	2,000	145.08	635.44	OXD#2, #3, #4	100.00%	95.00%	7.25	31.77	53.00%	16.84	336.78
Press #4 - TF IML 2D Topcoat Varnish	7.6	67.34%	100%	222,013	2,000	129.71	568.11	OXD#2, #3, #4	100.00%	95.00%	6.49	28.41	53.00%	15.06	301.10
Total Potential Uncontrolled Emissions:						867.90	3,801.38				190.07			214.36	

Note:
All of the coatings within one category (adhesive, ink, or varnish) are mutually exclusive with the other coatings within that category (adhesive, ink or varnish).
Press #3 has a maximum line speed of 550 ft/min (printing only) or 450 ft/min (printing and adhesive). Emission calculations are based on the worst case emission scenario of 450 ft / min of printing and adhesive.
Press #4 has a maximum line speed of 600 ft/min (printing only) or 500 ft/min (printing and adhesive). Emission calculations are based on the worst case emission scenario of 500 ft/min of printing and adhesive.
Heatset offset printing has an assumed flash off of 80%. Other types of printers have a flash off of 100%
There are negligible emissions from clean-up operations.
Multi-Color will limit press VOC usage to 53.22% of potential usage. Total modification VOC emissions are 39.0 tons/yr (72.23 * 0.5322 = 38.4 tons/yr from the presses, plus 0.56 tons/yr for natural gas combustion), therefore the PSD requirements do not apply.

Methodology:
Throughput = Maximum line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8,760 hours per year = MMin² per Year
VOC = Maximum Coverage pounds per MMin² * Weight percentage organics (volatiles minus water) * Flash off * Throughput * Tons per 2,000 pounds = Tons per Year
Controlled/Limited Emissions = Uncontrolled Emissions * (1 - (Capture Efficiency * Destruction Efficiency)) * VOC Input Limitation (%)

Natural Gas Combustion

Company Name: Multi-Color Corporation
Address City IN Zip: 2281 South U.S. 31, Scottsburg, Indiana 47170
Title V: T143-9310-00007
Reviewer: JM/EVP
Date: November 12, 1998

NATURAL GAS COMBUSTION EMISSIONS

SOURCE	Number of Furnaces	mmbtu/hr Rating	Annual Hrs Operation	Annual Nat. Gas (mmcf)	POTENTIAL TO EMIT									
					PM/PM10		SO2		NOX		CO		VOC	
					(lb/hr)	(Ton/Yr)	(lb/hr)	(Ton/Yr)	(lb/hr)	(Ton/Yr)	(lb/hr)	(Ton/Yr)	(lb/hr)	(Ton/Yr)
Press #1 dryer	1	7.76	8760.0	68.0	0.06	0.26	0.00	0.02	0.78	3.40	0.65	2.86	0.04	0.19
Press #2 dryer	1	7.76	8760.0	68.0	0.06	0.26	0.00	0.02	0.78	3.40	0.65	2.86	0.04	0.19
Press #3 boiler	1	6.00	8760.0	52.6	0.05	0.20	0.00	0.02	0.60	2.63	0.50	2.21	0.03	0.14
Press #4 dryer	1	12.00	8760.0	105.1	0.09	0.40	0.01	0.03	1.20	5.26	1.01	4.42	0.07	0.29
OXD#1	1	11.00	8760.0	96.4	0.08	0.37	0.01	0.03	1.10	4.82	0.92	4.05	0.06	0.26
OXD#2	1	4.00	8760.0	35.0	0.03	0.13	0.00	0.01	0.40	1.75	0.34	1.47	0.02	0.10
OXD#3	1	4.00	8760.0	35.0	0.03	0.13	0.00	0.01	0.40	1.75	0.34	1.47	0.02	0.10
OXD#4	1	5.00	8760.0	43.8	0.04	0.17	0.00	0.01	0.50	2.19	0.42	1.84	0.03	0.12
OXD#5	1	5.80	8760.0	50.8	0.04	0.19	0.00	0.02	0.58	2.54	0.49	2.13	0.03	0.14
Comfort Heater	1	4.50	8760.0	39.4	0.03	0.15	0.00	0.01	0.45	1.97	0.38	1.66	0.02	0.11
COMBUSTION TOTALS, TONS/YR.						2.26		0.18		29.71		24.95		1.63

NOTE: Assume that the heating value of natural gas is 1000 Btu / Cubic Foot.

SAMPLE CALCULATION	MMCF	X	LB	X	TONS	=	TONS
	YR		MMCF		LB		YR

	Natural Gas Emission Factors		
	Rated Capacity, MM Btu/hr		
	0 - 0.3	0.3-100	> 100
UNITS	Lb/ MMCF		
PM*	7.6	7.6	7.6
SO2	0.6	0.6	0.6
NOx**	94	100	190
CO	40	84	84
VOC	5.5	5.5	5.5
SOURCE	AP-42, Chapter 1.4		

* All PM is assumed to be less than 1.0 micrometer in diameter. Therefore, the PM emission factors may be used to estimate PM10, PM2.5, and PM1 emissions.